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BRUNEAU-KUNA GRAZING ENVIRONMENTAL IMPACT STATEMENT FINAL



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United States Department of the Interior

BUREAU OF LAND MANAGEMENT

Boise District Office
3948 Development Avenue
Boise, Idaho 83705

Dear Reader:

Attached for your review is the Final Livestock Grazing Environmental Impact Statement covering the Bruneau Resource Area and several allotments of the Owyhee Resource Area. The statement was prepared by the Boise District, Bureau of Land Management, pursuant to Section 102 (2)(C) of the National Environmental Policy Act of 1969.

The statement describes and analyses the environmental, economic, and social effects of proposed grazing management on 2,379,014 acres of public land in southwest Idaho. Four alternative levels of livestock grazing to the proposed action are considered.

The preparation of this final statement differs from previous procedures of reprinting the entire draft statement. This statement includes only those changes that are necessary in the Draft EIS and responses to public comments received on the Draft EIS.

This document, used with the draft statement distributed to the public on May 20, 1982 (filed with the Environmental Protection Agency on May 26, 1982) constitutes the Final Environmental Impact Statement.

This final statement is not a decision document; it merely discloses the probable impacts to the human environment that the proposed action and alternatives would create. The decision on the action to be taken will be based on the analysis contained in the Final EIS, BLM's manpower and budget constraints, public concerns and comments, and other multiple-use resource objectives or programs for the area. Decisions cannot be enacted for at least 30 days following filing of the final statement with the Environmental Protection Agency and distribution to the public. A summary document outlining the management direction for the Bruneau-Kuna EIS area will be prepared and made available as soon as a decision is reached, tentatively, late 1982. More specific decisions will subsequently be developed on an allotment-by-allotment basis.

Thank you for your interest and participation.

Sincerely yours,

for J. David Brunner
Martin J. Zimmer
District Manager

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DEPARTMENT OF THE INTERIOR

BRUNEAU-KUNA GRAZING
ENVIRONMENTAL IMPACT STATEMENT

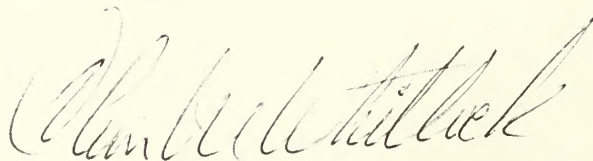
FINAL

Prepared By

Bureau of Land Management

Boise District Office

Idaho

A handwritten signature in cursive script, reading "Clair M. Whitlock". The signature is written in dark ink and is positioned above a horizontal line.

Clair M Whitlock, BLM State Director

BRUNEAU-KUNA
GRAZING ENVIRONMENTAL IMPACT STATEMENT

() Draft (X) Final Environmental Impact Statement

1. Type of Action: (X) Administrative () Legislative

2. Responsible Agencies:

a. Lead Agency: U.S. Department of the Interior, Bureau of Land Management, Boise District Office

b. Cooperating Agency: None

3. Abstract:

The Bruneau-Kuna Grazing Environmental Impact Statement analyzes the effects of livestock grazing on 2,379,014 acres of public land in southwest Idaho. Four grazing management alternatives to the Proposed Action are presented and analyzed in terms of their projected economic, social and environmental effects. Each alternative analyzes a different level of allocating the vegetative resource among competing users.

This document will be used to determine the proper level of forage allocation to livestock and wildlife use on the public lands, using the multiple use sustained-yield concept. The rangeland management program selected for the subject public land will be based upon the analysis presented in this document.

4. Comments Have Been Requested and Received from the Following:

Comments were requested from those agencies, organizations and individuals listed on pages 5-1 through 5-3 of the Draft EIS and received from those listed on pages 42 through 45 of the Final EIS.

5. Dates Draft Statement Made Available to EPA and the Public:

Draft: May 20, 1982 - available to the public

May 26, 1982 - filed with the EPA

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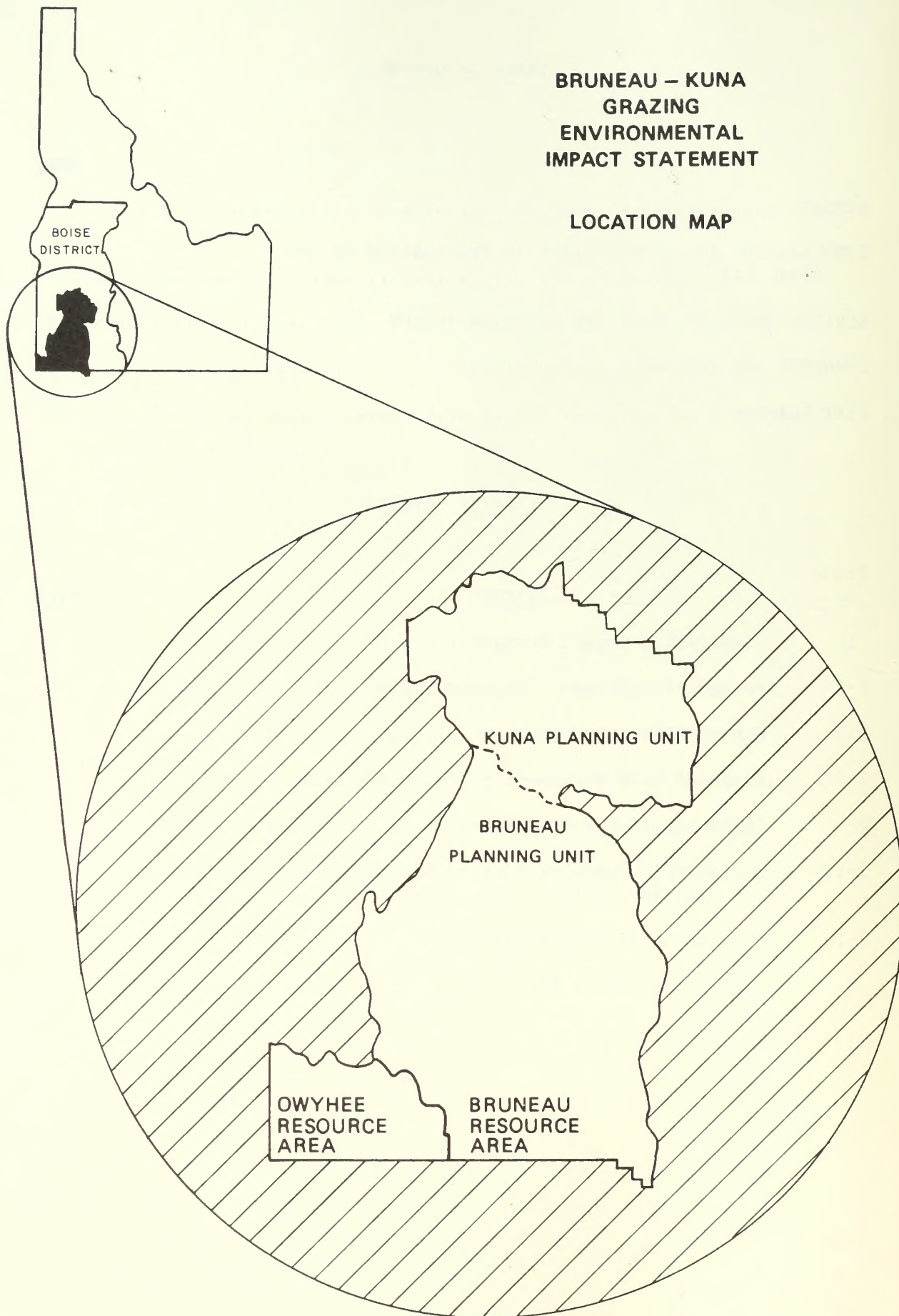
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**BRUNEAU – KUNA
GRAZING
ENVIRONMENTAL
IMPACT STATEMENT**

LOCATION MAP



SUMMARY

The Bureau of Land Management, Boise District, is proposing to implement an improved rangeland management program on 2,379,014 acres of public land located primarily in southwest Idaho. The purpose of the proposal is to improve the soil, water and vegetative resources within the area. This would be accomplished by properly allocating the vegetative resource between livestock, wildlife, and non-consumptive uses. Improved management of existing livestock use coupled with range improvement projects (i.e., fences, water development and brush control) would aid in the attainment of objectives.

The proposed management was developed from draft land use plans for the Bruneau Resource Area and the southern portion of the Owyhee Resource Area. These plans will be finalized following completion of this EIS. Alternatives to the proposed action include: 1) Continue Present Management, 2) No Livestock Grazing, 3) Increased Livestock Use, and 4) Reduced Livestock Use.

Major issues that were identified during the scoping process that will be resolved during this land use plan/EIS process include: 1) what is the appropriate level of livestock grazing on the area, 2) should none, all or a portion of a pipeline proposed on the Jacks Creek Plateau be constructed, and 3) from an economic standpoint, what is the optimum balance between livestock use and other consumptive or non-consumptive uses.

PROPOSED ACTION

The proposed action would allocate vegetation for consumptive use by livestock and wildlife on 49 allotments. Vegetation would be allocated to satisfy reasonable wildlife numbers determined during the BLM planning process. Reasonable numbers represent the Idaho Department of Fish and Game 1990 population goals. The initial allocation to livestock would be 202,275 Animal Unit Months (AUM's). This is 7% above the past five-year licensed use but 15% below the current active grazing preference. Wildlife would be allocated 2,333 AUM's.

The vegetation production data presented in this environmental impact statement were collected in the field seasons of 1979, 1980 and 1981 according to accepted Bureau standards. This information is suitable for planning purposes. In implementing the decision, current rangeland management policy will be followed. Production data will be tempered with forage utilization and other monitoring studies to ensure that the initial stocking rate by allotment is consistent with the land use plan objectives. Modification (either increase or decrease) in stocking rate will be based on production data, monitoring and the land use plan.

Under the proposed action, two levels of grazing management are proposed. Intensive management would be applied to 25 allotments and

less intensive management would be applied to 24 allotments. In the intensive management category, allotment management plans (AMP's) incorporating specific grazing systems and multiple use objectives would be developed following completion of this EIS and the land use plans. AMP's would not be developed in the less intensive category. However, season of use would be established and grazing systems could be developed.

The proposal includes measures to improve or protect fisheries habitat, wildlife habitat, cultural resources and other resource values. Approximately 153 miles of fisheries habitat would be managed with the primary management objective being to improve riparian and fisheries habitat condition. An additional 125 miles of canyonland would be reserved for bighorn sheep, river otter, mountain quail and other riparian associated wildlife (including fisheries habitat).

Implementation of the proposed action would require installation of the following range improvements and land treatment projects:

250 miles of fence	75 cattleguards
125 spring developments	105 miles of pipeline
235 reservoirs	234,000 acres of brush control
Six wells	42,300 acres of brush control & seeding
Eight water catchments	

The proposed action includes development of 19 miles of pipeline on the plateau between Little Jacks and Big Jacks Creek.

ALTERNATIVE #1 - CONTINUE PRESENT MANAGEMENT

Under this alternative, the current level and type of grazing use would continue. The five-year average licensed use of 189,800 AUMs is assumed to continue. A limited amount of project development would be done.

ALTERNATIVE #2 - NO LIVESTOCK GRAZING

All livestock grazing on public lands administered by the BLM would be terminated. All vegetative production would be available for wildlife and non-consumptive uses. No new project development for livestock management would be constructed. Existing fences would be removed.

ALTERNATIVE #3 - INCREASED LIVESTOCK USE

This alternative addresses additional range improvements and increased forage allocations that could occur if Congress does not designate any wilderness study areas within the EIS area as wilderness. The forage allocation would be 1,833 AUM's above that described in the proposed action, because of increased water development. The initial allocation for livestock would be 204,108 AUM's and the allocation for wildlife would be 2,333 AUM's. Under this alternative, an additional 22

miles of pipeline on the Jacks Creek plateau and an additional 1,600 acres of brush control is proposed. Other management proposals would be the same as those described in the proposed action.

ALTERNATIVE #4 - REDUCED LIVESTOCK USE

This alternative addresses a lower level of livestock use, later livestock turn out dates on 17 allotments, and assumes a lower level of funding than does the proposed action. The funding level is based on the amount of range improvement money anticipated to be returned to the study area over a ten year period.

Livestock would be allocated 175,922 AUM's and wildlife would be allocated 2,333 AUM's. Project development would be the same as that described in the proposed action except that none of the pipeline proposed on the Jacks Creek plateau would be constructed and 81,600 acres of brush control that was proposed in the proposed action would not be completed.

ENVIRONMENTAL CONSEQUENCES

Proposed Action

The proposed action would improve range condition. The range condition class would improve on approximately 70% of the area. Plant vigor and production would improve on the remainder of the area; but because of low site productivity, lack of desirable plant species, and low precipitation levels, 30% of the area would remain in the poor range condition class. The 278 miles of riparian area identified for grazing exclusion or special fisheries habitat management would show improvement over 20 years. The remainder of the riparian areas would continue to receive heavy livestock use and would remain in less than optimum condition. Soil stability on high and critical erosion hazard areas would be maintained. Stream bank erosion would increase on streams not fenced or managed primarily for fisheries habitat improvement.

Forage production is expected to increase from improved grazing management, increased water development and land treatment projects. In 20 years, livestock use would increase from the current five year average use of 189,800 AUM's to 269,785 AUM's.

A gradual improvement in mule deer diet would occur and mule deer habitat objectives would be met. Antelope, population levels would increase. The proposal would generally be beneficial to bighorn sheep even though some adverse impacts may occur from the proposed Jacks Creek pipeline. Sage grouse population levels would increase. Fisheries and riparian associated wildlife would be benefitted on those areas showing riparian habitat improvement. In years of below normal vegetative production, livestock use may adversely impact the prey base and birds within the Snake River Birds of Prey Area.

Visual resources would be adversely impacted by some of the proposed

project development and land treatments. Wilderness values would be maintained on most wilderness study areas. However, increased livestock use would adversely impact the ecological values of some areas currently in good or excellent range condition. Recreation quality and uses within the area would be enhanced.

Ranch income changes over the long term would amount to +\$683,700. The net present worth of the proposed action would be +\$503,700. In 20 years, regional employment would increase by 132 jobs and the ranching community would have a strengthened feeling of social well being.

Alternative #1 - Continue Present Management

Under this alternative, vegetative response would be variable. On those allotments where the range inventory indicated excess forage, range conditions would improve. On allotments where the inventory indicated forage shortages, range condition would decline. Consequently, overall condition and forage production would show little change. Similarly, little overall change in wildlife habitat conditions would occur. Conditions are generally unsatisfactory on much of the area. Maintaining current levels of grazing use in the birds-of-prey area would reduce potential adverse impacts identified for the proposed action. Fisheries habitat conditions would decline because of continued concentration of livestock on riparian areas.

Although recreation use would increase due to current trends the quality of hunting and fishing would decline. This alternative would have fewer adverse impacts to wilderness values than the proposed action. Most of the areas in good range condition would experience reduced livestock use, because of range condition improvement in affected allotments.

Ranch income would not change over the 20 year period. The net present worth of this alternative would be -\$715,900.

Alternative #2 - No Livestock Grazing

Implementation of the no livestock grazing alternative would result in improved vegetative and watershed conditions. However, the absence of sagebrush removal projects would limit vegetative improvement on certain range sites. Wildlife and fisheries habitat conditions and population levels would respond more favorably than in any other alternative. Recreation, visual resources, and wilderness values would also show significant enhancement. Elimination of grazing, however, would have considerable adverse impacts to livestock operators. Ranch income changes would amount to -\$1,593,304. The net present worth of this alternative would be -\$11,740,900. The ranching community would experience a reduced feeling of social well being.

Alternative #3 - Increased Livestock Use

Impacts of this alternative would be similar to those described for the proposed action, when the entire study area is considered. However, there would be significant differences in the area of the Jacks Creek

pipeline and on those areas with increased sagebrush treatment. Development of 22 miles of spur lines to the 19 mile portion of the Jacks Creek pipeline included in the proposed action would open up additional areas for livestock grazing. This would create reductions in vegetative vigor and localized concentration areas near water sources. However, the overall condition class of the area would remain unchanged. This increased livestock use would adversely impact bighorn sheep, visual resources and wilderness values. It is anticipated that the Jacks Creek bighorn sheep herd would be lost because of competition with livestock.

The net present worth of this alternative would be +\$625,900. Ranchers income changes would be +\$725,400.

Alternative #4 - Reduced Livestock Use

Later livestock turnout dates would benefit most resources on affected allotments. Antelope and sage grouse populations would increase because of reduced competition on spring ranges. Fisheries and riparian habitat conditions would improve over levels described in the proposed action, because of decreased livestock use and shortened seasons of use. Reduced sagebrush treatments in several allotments would reduce the amount of vegetative improvement and forage production from that which would be achieved in the proposed action. By not constructing any of the Jacks Creek pipeline, pristine vegetation, wildlife habitat, visual quality and wilderness values would be maintained on the Jacks Creek plateau. However, without the pipeline, the options for implementing future grazing systems or Allotment Management Plans on the two affected allotments would be reduced. This could result in unsatisfactory vegetative response on the remainder of these allotments.

Ranch income changes would be +\$476,800, and the net present worth of this alternative would be +\$51,200.

Table 1 shows a comparison of impacts between the proposed action and the alternatives.

Table 1
Comparative Impact Summary
(Projected 20-Year Impacts unless otherwise noted)

Resource	Present Situation	Proposed Action	Alternative #1 Continue Present Management	Alternative #2 No Grazing	Alternative #3 Increased Livestock Use	Alternative #4 Reduced Livestock Use
Vegetation:						
Condition Class (% of area)						
Excellent	Trace	Trace	Trace	2%	Trace	Trace
Good	14%	26%	15%	26%	26%	27%
Fair	19%	24%	18%	28%	24%	24%
Poor	54%	35%	54%	31%	35%	34%
Treated	13%	15%	13%	13%	15%	15%
Soil & Water Resources:						
Soil Stability	Uplands are generally stable. However, stream bank erosion is occurring on those streams in poor condition (26% of public stream miles). 49% are in fair condition, & 25% in good & excellent condition.	Stream areas being fenced or receiving special management would improve on 26% of public stream miles. Soil stability would decrease on areas presently in poor & fair condition (49% of public stream miles). 25% would remain unchanged.	Soil stability of stream banks would decrease in areas accessible by livestock (about 75% of public stream miles). 25% would remain unchanged.	Soil stability of all stream banks presently in poor & fair condition would increase (75% of public stream miles). 25% would remain unchanged.	Same as Proposed Action	Soil stability of stream banks & riparian areas would improve on 46% of the area's public stream miles 29% would decline in soil stability & 25% would remain unchanged.
Wildlife:						
Mule Deer	Approximately 81% of the mule deer habitat is in poor or fair condition. Population: 2,345 Summer 5,075 Winter	Improved range conditions & forage allocations would benefit mule deer. Management objectives would be met. Population: 3,175 Summer 5,840 Winter	Competition would continue on ranges in poor & fair condition & season of use conflicts would continue on spring & winter ranges. Management objective would not be met.	Elimination of livestock competition for forbs & grasses & improvement in vegetative condition would benefit mule deer. Populations would exceed management objectives.	Similar to proposed action. Some expanded water development.	Delayed (May 15) livestock turnout would remove spring competition for grass. Removal of competition should result in healthier does & a resultant better fawn crop. Management population objectives would be achieved.
Antelope	Approximately 80% of the antelope habitat is in poor or fair condition. Population: 980 summer 840 Winter	Winter/early spring antelope range would improve slightly but remain in poor condition. Establishing crucial antelope winter/early spring range for priority management to improve habitat conditions through changes in turnout dates and/or grazing management would provide for population increases.	Habitat conditions & population levels would remain static.	Elimination of livestock competition for grasses & forbs would be beneficial to antelope. Populations would exceed 1,580 animals.	Similar to proposed action. Some expanded water development.	Lack of spring competition for grasses & forbs (prior to May 15) would benefit pregnant does & antelope health in general. Population would increase to 1,580 animals.
Bighorn Sheep	Habitat Condition: Excellent - 1% Good - 2% Fair - 40% Poor - 29%	Generally beneficial Jacks Creek pipeline may displace 5-10 bighorns. Establishing the Battle Creek bighorn herd area as a key management area for improvement of bighorn habitat would allow management goals to be met.	Habitat conditions would not change. Since most is in satisfactory condition, management objectives would be met.	Habitat conditions would improve & management objectives would be met.	Jacks Creek pipeline would severely impact bighorn sheep habitat & cause intraspecific stress. Bighorn inbreeding & resultant loss of the Little Jacks population would be expected.	Improvement in upland range condition would result. Management objectives would be met.
Sage Grouse	Most habitat is currently in unsatisfactory condition & water distribution limits suitable habitat.	Although forage allocation & fencing of riparian areas would benefit sage grouse, continued competition for forbs on spring & summer ranges may have adverse impacts on young sage grouse. Establishing livestock rest or deferment systems on the critical brood rearing areas plus measures to improve meadow complexes would allow populations to increase.	Habitat conditions would remain unchanged. Population levels would remain the same or decline.	Habitat conditions, particularly riparian areas would improve. Population levels should double.	Similar to proposed action. Some expanded water development.	Later May 15 livestock turnout would allow greater growth of forbs & grasses on uplands & meadows. Improved food & cover for sage grouse chick would result. Population should exceed current level.

Table 1 (cont.)

Resource	Present Situation	Proposed Action	Alternative #1 Continue Present Management	Alternative #2 No Grazing	Alternative #3 Increased Livestock Use	Alternative #4 Reduced Livestock Use
Birds of Prey	Birds of prey that depend on the townsend ground squirrels may be affected by the proposal and alternatives.	Increases in livestock use on spring ranges may adversely impact prey species during years of below normal precipitation.	Present levels of grazing do not appear to be adversely impacting prey populations.	Little change in present conditions. Perennial grass could supply adequate nutrition to prey species in drought years.	Same as the proposed action.	Same as the proposed action.
Fisheries:						
Fisheries Habitat Condition (miles of stream)						
Excellent	2	21	2	269	Same as Proposed	47
Good	113	186	78	157	Action	200
Fair	221	113	180	31		179
Poor	121	137	197	0		31
Water Quality and						
Quantity (% on 21 streams)						
Excellent	0	58	0	67	Same as Proposed	62
Good	57	29	18	21	Action	26
Fair	23	10	39	12		10
Poor	20	2	43	0		2
Trout Populations	915,000	8% increase	13% decrease	47% increase	Same as Proposed Action	25% increase
Visual Resources:	Scenic quality varies from low to high.	General decline in scenic quality. Some adverse impacts due to project development & continued heavy livestock use on some riparian areas. Enhancement of fenced riparian areas.	Slight decline in scenic quality.	Improvement in scenic quality.	Similar to proposed action. Scenic quality would be lessened in the area of the Jacks Creek pipeline.	Scenic quality would be enhanced on fenced stream miles & on certain streams affected by May 15 turnout dates. Scenic quality of the Jacks Creek plateau would be maintained.
Wilderness:						
Wilderness Characteristics	All WSAs (447,000 acres) natural appearing, roadless, with outstanding opportunities for primitive recreation and/or solitude.	Potential project development affecting 144,000 acres recommended as non-suitable for wilderness; brush control/seeding would destroy wilderness characteristics on 19,250 acres; chemical spraying on 5,450 acres; controlled burning (fireline construction) 6,650 acres.	No Impact; maintenance of present conditions.	All wilderness characteristics would be enhanced; apparent naturalness improved; opportunities for solitude & primitive recreation expanded.	Potential project development could affect all acres; wilderness character of plateau between Little & Big Jacks destroyed by pipeline; brush control/seeding would destroy wilderness character of 19,950 acres; 6,350 acres sprayed with chemicals.	Same as Proposed Action
Supplemental Values	48,200 acres in good ecological condition provide representation of Sagebrush Steppe ecosystem under natural conditions; sensitive species habitat (bighorn sheep, river otter, mt. quail, red-banded trout)	Increased livestock grazing on 43,500 of 48,200 acres; pipeline would increase grazing pressure on 7,200 of these acres. Wilderness values would decline on these areas.	Decreased grazing on 35,000 acres; increased grazing on 13,000 acres. Wilderness values would change correspondingly.	No livestock grazing on 48,200 acres in good condition have potential to return to pristine natural condition if livestock grazing is eliminated.	Increased grazing on all 48,200 acres; grazing increased on all of 1,000 acre proposed Research Natural Area. Ecological values would decline on these areas.	Increased livestock grazing on 36,500 acres; no increase on 11,700 acres; no impacts from pipeline.
Recreation:						
Quality	Fair to Good	Quality would improve.	Quality would remain static or decline.	Quality would improve.	Quality would improve.	Quality would improve.
Hunting Use (hunter days)	123,000	194,600	184,500	210,000	194,600	205,000
Livestock: (AUMs)						
Initial Allocation	5 year average licensed use - 189,800	202,275	189,800	0	204,108	175,922
20 Year Allocation	Active Grazing Preference - 238,214	269,815	189,800	0	277,296	242,949

Table 1 (cont.)
Comparative Impact Summary
(Projected 20-Year Impacts unless otherwise noted)

Resource	Present Situation	Proposed Action	Alternative #1 Continue Present Management	Alternative #2 No Grazing	Alternative #3 Increased Livestock Use	Alternative #4 Reduced Livestock Use
Economics:						
Net Present Worth	NA	+\$ 503,700	-\$ 715,900	-\$11,740,000	+\$ 625,900	+\$ 51,200
Benefit Cost Ratio	NA	1.156	NA	0.144	1.189	1.017
Annual Rancher Income (returns above cash costs)						
20-Year Initial	\$1,823,156	+\$ 683,700 +\$ 167,675	No Change	-\$1,593,304 -\$1,593,304	+\$ 725,400 +\$ 184,162	+\$ 476,800 -\$ 60,758
Range Improvement Construction Cost						
BLM	\$394,000	\$2.9 million	\$394,000	\$550,00	\$3.0 million	\$2.6 million
Rancher	\$247,000	\$1.3 million	\$247,000	0	\$1.4 million	\$1.2 million
Annual Grazing Fee Distribution						
Range Betterment	\$176,500	\$255,000	\$176,500	0	\$256,000	\$226,100
State of Idaho	44,100	64,000	44,100	0	64,000	56,500
Federal Treasury	132,400	191,000	132,400	0	192,000	169,600
Total	\$353,000	\$570,000	\$353,000	0	\$512,000	\$452,200
Regional Income Changes						
Direct	-----	+\$ 990,700	+\$ 30,500	-\$1,114,900	+\$1,030,400	+\$1,067,600
Secondary	-----	+\$ 299,200	+\$ 3,800	-\$ 511,400	+\$ 300,600	+\$ 288,600
Regional Employ- ment (jobs)	13,961	+132	+2	-127	+134	+147
Social Conditions:	People feel the quality of life within the study area is good.	Most ranch related users could experience a strengthening of their social well being.	No change in the existing social systems.	The social well being of the ranching community would be adversely impacted.	Most ranch related users would experi- ence a strengthening of their social well being.	Most ranch related users would experi- ence a strengthening of their social well being.

CONSULTATION AND COORDINATION IN
PREPARATION OF THE FINAL EIS

A 60 day public comment period (May 20 through July 19, 1982) was provided on the Draft EIS to allow public review and comment. Approximately 400 copies of the Draft EIS were mailed to individuals, Federal, state, and local government agencies and to non-government organizations.

Notice of its availability was published in the Federal Register on June 1, 1982. In addition to the Federal Register notice, a statewide press release was issued from the BLM Idaho State Office. This news release was sent to approximately 85 statewide and regional television and radio stations and newspapers. The Federal Register and news releases also gave the date and place for two public hearings that were held on June 29, 1982 at the Rimrock Jr./Sr. High School, Grand View, Idaho and on July 1, 1982 at the Boise Public Library, Boise, Idaho.

During the formal review period, 61 letters were received from Federal, State and local agencies; private organizations and interested citizens. Following the comment period, 33 letters were received. All letters, including those received after the public comment period, were reviewed and considered in the preparation of the Final EIS. Ten individuals presented oral testimony at the Grand View hearing and 20 individuals presented testimony at the hearing in Boise. A hearings officer, Charles Hazier, Shoshone BLM District Manager, presided over the hearing and verbatim testimony was recorded by a certified court reporter. Joe Zimmer, Boise District Manager; Butch Peugh, Bruneau Area Manager; and Ted Milesnick, EIS Team Leader comprised the BLM panel at the hearings.

All letters and public hearing comments were reviewed and considered in the preparation of the Final EIS. Table 3 in the Comments and Response Section lists the letters that were received and the individuals who presented oral testimony at the public hearing.

After reviewing the comment letters and testimony presented at the two hearings it was evident that many members of the public were not fully satisfied with the contents or quality of the Draft EIS. Because of this, two work group sessions were held on August 6 and August 10, 1982 to discuss major issues concerning the EIS and possible solutions. Participants at these two sessions were Bill Meiners, who testified for Idaho Wildlife Federation and NRDC; Russell Heughins, District 3, Idaho Wildlife Federation; Chris Yoder, Northern Rockies Chapter, Sierra Club; Bruce Boccard, Committee for Idaho's High Desert; Ted Weigold, local conservationist; Gene Davis, Grazing Advisory Board Chairman and local rancher; Frank Bachman, Northwest and Battle Creek Allotment permittees; Mike Hanley, Owyhee EIS Action Committee; Bob Collett, Castle Creek Grazing Association President; Gene Tindall, Owyhee Cattlemen's Association President; Walt Bodie, Idaho Department of Fish and Game; and BLM personnel. Major issues that were discussed at these two sessions included the adequacy of the EIS, BLM's compliance with applicable laws, wilderness management, multiple use management concepts, the Jacks Creek

pipeline, forage allocation, the range of alternatives and the capability of the Bureau to implement and monitor the proposal.

These two sessions were very beneficial to the Bureau in preparing the Final EIS. Many of the points that were raised during the comment period were discussed and suggestions were made on ways to improve the Final EIS.

Major changes in the EIS resulting from these sessions and other comments received are as follows:

- 1) The proposed action has been rewritten to provide more rationale for its development and the description of its major components has been expanded.
- 2) Summary tables have been included to show the relationship between the proposed action and alternatives to the Management Framework Plans for the area.
- 3) The description of the Jacks Creek pipeline has been expanded.
- 4) The forage allocation procedures have been expanded and an example given.
- 5) The implementation schedule for proposed project development and land treatments that are located within wilderness study areas has been expanded.
- 6) Mitigation measures have been developed to reduce or eliminate some of the adverse impacts identified in the Draft EIS. These mitigation measures are incorporated in the revised description of the proposed action.

The major mitigation measures include the following:

- a) Provisions have been made to allocate forage for increased wildlife populations beyond the 1990 population goals.
- b) The Battle Creek bighorn sheep area would be established as a key management area for the improvement of bighorn sheep habitat.
- c) Crucial antelope winter/early spring ranges would be recognized for priority management to improve habitat conditions through changes in turnout dates and/or grazing system design.
- d) Livestock rest or deferment systems would be established on critical sage grouse brood rearing areas. If grazing systems do not improve habitat conditions, large meadow complexes may be fenced and excluded from grazing, or have special grazing management applied (e.g. use only after seed ripe).
- e) Increase in livestock use would not be allowed if increased use would be detrimental to stream bank stability.

The analysis of impacts in the environmental consequences chapter has been modified to reflect these mitigation measures.

Because of the numerous changes made in the proposed action, a revised description of it follows. Other changes required in the Draft EIS are included in the text change section which follows the comment and response section.

REVISED DESCRIPTION OF THE PROPOSED ACTION

The Bureau of Land Management (BLM) is proposing to implement an intensive range management program on approximately 2.4 million acres of public lands located primarily in southwestern Idaho. A small portion of the area is located in northcentral Nevada. The lands are located within the Bruneau Resource Area and the southern portion of the Owyhee Resource Area. The range management program is designed to achieve multiple use objectives developed through BLM's Land Use Planning Process. The proposal includes actions related to livestock grazing management and the allocation of the vegetative resources to various consumptive and nonconsumptive uses. Major components of the proposal include:

- 1) vegetation allocation,
- 2) livestock grazing management, and
- 3) range management facilities and vegetative treatment practices.

Multiple use objectives and the management proposal were developed from individual resource objectives and recommendations considered during the BLM planning process. Tables 2-13 and 2-14 show the relationship between the Multiple Use Recommendations/EIS and Objectives/EIS respectively and are found at the end of this chapter. Copies of the land use plans are available for review at the Boise District BLM Office. The purpose of the proposal is to attain a portion of the multiple use objectives developed in the Management Framework Plans for the area. The livestock grazing proposal in this EIS is intended to achieve the range management objectives as well as a portion of the other resource objectives. Resources other than range management have proposed additional management measures in the MFP that are separate and apart from those related to livestock grazing management. Therefore, attainment of MFP objectives for these resources is not intended to occur entirely from implementation of the livestock grazing proposal. Major objectives of the proposal are as follows:

- 1) Maintain soil stability on 660,000 acres of high and critical erosion hazard by reducing or minimizing wind and water erosion.
- 2) Increase the vigor, density and production of desirable vegetation on 745,512 acres within 20 years. These areas are currently in poor condition, but because of low site productivity and the lack of desirable vegetative species, improvement into the fair condition category would not be anticipated.
- 3) Increase 532,855 acres currently in poor range condition to fair condition in 20 years. Increase 448,698 acres currently in fair condition to good condition in 20 years. Maintain the condition class of 338,716 acres currently in good and excellent condition. Maintain and/or improve 313,233 acres currently in a disturbed, burned or seeding category. Following this 20 year period, the goal would be to improve all range to good condition.

- 4) Increase total forage production from 210,479 AUM's to 283,244 AUM's within a 20 year period. The forage production potential that could ultimately be achieved if all ranges were improved to good condition would be 430,000 AUM's.
- 5) Increase livestock use from 202,275 AUM's to 269,785 within 20 years.
- 6) Improve 93,500 acres of bighorn sheep habitat to provide adequate food, cover and water for 420 bighorn sheep by 1990. Population objectives within the Bruneau Resource Area are as follows: 220 bighorns on the Owyhee River, 100 bighorns in the West Fork of the Bruneau River and maintenance of the 100 bighorns on Little Jacks Creek.
- 7) Improve 547,200 acres of mule deer habitat (winter and spring) so there is adequate food, cover and water for 5,840 animals by 1990.
- 8) Improve 1,483,000 acres of mule deer habitat (summer and fall) so there is adequate food, cover and water for 3,175 animals by 1990.
- 9) Improve 1,452,000 acres of antelope habitat to provide sufficient forage, water, cover and space for 1,580 animals by 1990.
- 10) Improve 939,000 acres of sage grouse habitat to increase nesting, brood rearing and wintering areas.
- 11) Improve 153 miles of public stream miles with poor and fair fisheries habitat condition to fair and good condition by 1990.
- 12) Preserve wilderness characteristics and values in areas recommended as "suitable" for wilderness (all WSAs will be managed under the Wilderness IMP until released from the wilderness review process).

Forage Allocation

In order to improve range condition and satisfy forage demands, the vegetative resource would be allocated among livestock, wildlife and nonconsumptive uses (watershed, plant maintenance requirements).

Allocation of 2,333 AUM's would be made by pasture to provide the forage needs for reasonable numbers of big game animals (antelope, deer, elk and bighorn sheep). The population management levels are given in the objectives above and were determined through public input, and from consultation with the Idaho Fish and Game Department, during the land use planning process and represent the 1990 Fish and Game Departments management goals. A total of 202,275 AUM's are being allocated for livestock use. The present active grazing preference is 238,214 AUM's. The past 5-year average licensed active use has been 189,800 AUM's. Vegetative allocation by allotment is shown in Table 2-1.

Table 2-1
Forage Allocation - Proposed Action
(AUM's)

Allotment	Current Active Grazing Preference	5-Year Licensed Use 1/	Total Forage Production	Forage Not Allocated 1/	Wild- life AUM's	Initial Livestock Allocation 3/	% Change From Pref.	% Change from 5-Year Use	Existing Season-of-Use	Kind of Livestock
524 Garat Individual	80	80	44	0	0	44	- 45	- 45	3/15-11/15	H
584 Garat	33,305	22,378	14,012	0	342	13,670	- 59	- 39	4/1-9/30	C
629 "45"	3,852	3,852	8,098	4,038	208	3,852	0	0	3/1-2/28	C & H
636 Roaring Springs	430	278	313	0	0	313	- 27	+ 13	3/1-6/20	C
801 Castle Creek	22,338	21,610	14,478	0	78	14,400	- 36	- 33	4/1-1/31	C
802 Battle Creek	13,386	13,290	12,157	669	206	11,282	- 15	- 15	4/1-1/31	C & H
803 Big Springs	17,851	16,248	14,648	0	394	14,254	- 20	- 12	3/16-11/30	C & H
804 Bennett	960	717	644	0	3	641	- 33	- 11	5/1-10/15	C
805 Riddle	27,199	23,475	15,091	0	232	14,859	- 45	- 37	3/16-2/28	C & H
806 Pole Creek*	156	125	128	0	0	128	- 18	+ 2	4/1-9/30	C
807 Camas Creek Pocket*	375	375	529	0	4	525	+ 40	+ 40	7/1-9/30	C
808 Northwest	13,400	10,363	20,034	1,164	158	18,712	+ 41	+ 81	3/16-2/28	C
809 Center	6,661	5,896	17,816	0	42	17,774	+167	+201	3/16-2/28	C
810 Scotts Table	575	576	677	0	30	647	+ 13	+ 13	4/16-5/31	C
811 Canyon View Seeding*	2,281	837	1,741	0	6	1,735	- 24	+ 10	3/1-3/31 & 10/1-2/28	C
812 Miller Table Seeding*	740	685	986	0	6	980	+ 32	+ 43	11/16-1/31	C
813 Mtn. Home Subunit	9,318	6,459	10,447	0	93	10,354	+ 12	+ 62	4/31-6/30 & 11/1-12/30	C
814 Long Tom Subunit	3,134	2,055	3,416	0	88	3,328	+ 9	+ 66	4/1-12/15	C
815 Mud Springs	1,516	1,308	1,809	0	9	1,800	+ 19	+ 38	4/1-12/30	C
816 Lockman Butte*	542	542	542	0	0	542	0	0	11/16-1/31	C
817 Martha Ave.	871	781	871	0	0	871	0	+ 10	4/1-6/30 & 11/1-12/30	C
818 Ditto Creek	2,128	1,789	2,227	0	99	2,128	0	+ 16	4/1-1/31	C
819 Dive Creek	313	479	476	0	35	441	+ 52	0	5/16-10/30	C
820 Cornell	1,314	1,068	792	0	18	774	- 40	- 26	4/1-6/15 & 10/16-12/31	C
821 Chalk Flat*	2,511	2,171	2,145	0	0	2,145	- 15	- 1	4/1-6/30 & 10/16-12/31	C & S
822 Slater Flat*	2,618	1,200	1,200	0	0	1,200	- 54	0	4/1-6/30 & 10/16-12/15	C
823 McConnell*	15	15	123	0	23	100	+850	+850	10/1-10/31	C
824 Bonneville Point*	522	332	315	0	3	312	- 40	- 5	3/1-4/30 &	C
825 Sunnyside Spring-Fall*	23,852	11,770	20,065	0	0	20,065	- 16	+ 70	4/1-6/30 10/16-12/15	C & S
826 Sunnyside Winter*	14,361	11,587	13,711	0	6	13,705	- 5	+ 18	12/16-2/28	C & S
827 Rattlesnake Seeding*	1,368	1,294	1,672	0	0	1,672	+ 22	+ 29	4/1-12/31	C
828 Crater Ring Seeding*	748	673	398	0	0	398	- 47	- 41	4/3-6/5	C
829 2+ Custodial*	202	70	260	0	9	251	+ 29	+271	4/1-12/15	C
830 Section 34*	10	10	10	0	0	10	0	0	4/1-8/31	C
831 Sheep Creek*	276	231	231	0	0	231	- 16	0	4/1-5/30 & 11/1-12/15	C
832 Duck Ponds*	56	56	56	0	0	56	0	0	7/1-10/15	C
833 Section 35*	17	17	17	0	0	17	0	0	4/1-4/30	C
834 Rattlesnake Creek*	220	204	223	0	3	220	0	+ 7	4/1-9/30 & 10/16-11/30	C
836 West Tacket Creek*	264	264	277	0	7	270	+ 5	+ 5	4/1-10/31	C
837 Rabbit Springs*	84	75	25	0	0	25	- 70	- 67	4/1-9/30	C
838 Section 1*	8	8	10	0	0	10	+ 25	+ 25	4/1-4/30 & 10/1-10/31	C
839 Melba Seeding*	300	300	322	0	0	322	+ 7	+ 7	4/1-6/30 & 10/16-11/30	C
840 Strickland-Hall-Yates	2,666		3,112	0	28	3,084	+ 16		3/1-3/31 & 6/16-9/30	C
841 Buckhorn*	444		652	0	1	651	+ 47		3/1-2/28	C
842 M & L	1,100	24,257 ^{4/}	1,559	0	7	1,552	+ 41		3/1-5/30 & 11/1-12/31	C
843 Simplot	10,174		7,758	0	57	7,701	- 24		3/1-2/28	C
844 Tindall & Sons	6,224		6,901	0	30	6,871	+ 10		3/1-2/28	C & H
845 Antelope Creek	2,135		2,781	0	13	2,768	+ 30		3/1-6/30 & 9/16-2/28	C & H
846 Alzola	5,314		4,680	0	95	4,585	- 14		3/1-2/28	C & H
Total	238,214	189,800	210,479	5,871	2,333	202,275	- 15	+ 7		

* Less intensive allotments.

^{1/} Reductions or increases would not be more than 15% from this figure in accordance with 43 CFR 4110.3-2(d)3.

^{2/} Includes forage not allocated because of lack of water.

^{3/} This allocation would be achieved in 5-years through development of water.

^{4/} Total 5-year licensed use for allotments 840 through 846.

In 20 years, it is anticipated that available forage would increase to 269,785 AUM's as a result of improved range conditions, land treatment projects and water development.

A summary of the initial and projected 20 year forage allocation for the proposed action and all alternatives is shown on Table 2-2.

On the Owyhee portion of the study area, the vegetative allocation is based on 50% utilization levels of grasses because specific grazing systems incorporating periodic rest treatments have been identified. On allotments within the Bruneau Resource Area, where specific grazing systems have not been identified, the vegetative allocation was based on plant use factors. These factors vary by season to reflect changes in: the physiological requirements of the forage species, animal preference and availability of the forage species. Utilization levels of current years production vary with vegetation type, species composition, animal dietary requirements and season-of-use. Utilization levels are generally between 30 and 50 percent on grasses.

The total amount of available vegetation was determined by a soil vegetative inventory conducted in 1979, 80 and 81 and by assessing current range condition data and licensed livestock use. The allocation of this vegetation between consumptive and non-consumptive uses was based on animal numbers (determined through the Bureau's planning process), animal forage requirements, dietary preference and plant maintenance requirements (Appendix B Summarizes the Procedures Used).

Methodology for Forage Allocation - An example of the methodology for forage allocation follows:

Step 1: Allowable use factors by species by season is multiplied by the total annual production. This results in the pounds of forage available for allocation.

Step 2: The amount of annual forage produced divided by the amount of forage required in a diet (Appendix Tables B-1 and B-2) for a 30 day period becomes AUMs.

Example:

- a) assume 40% use factor for all plants
- b) using cattle in the spring period.

A particular range site is producing

1000 lbs shrubs	x .40 (use factor)	= 400 lbs
800 lbs grass	x .40	= 320 lbs
100 lbs forbs	x .40	= 40 lbs

Then

400 lbs shrub (forage)	÷ [.07* x 800]	= 7.1 AUMs
320 lbs grass (forage)	÷ [.90* x 800]	= .4 AUMs
100 lbs forbs (forage)	÷ [.03* x 800]	= 1.6 AUMs

* % of diet

Thus, the lbs of forage divided by the percent of the cattle's diet is of the total pounds of forage required for a 30 day period (Table B-1 times Table B-2).

Because grass is the limiting factor, only .4 AUMs are allocated.

This same type calculation was done for horses, domestic sheep, mule deer, antelope and bighorn sheep. The allocation to wildlife was taken off the top before the allocation to livestock.

Table 2-2
Forage Allocation Summary (AUM's)

	Total Forage Produc- tion	Wild- life Allo- cation	Forage Not Allo- cated 1/	Livestock Allocation	% Change From Current Grazing Preference	% Change From 5 Year Ave. Use
<u>Proposed Action</u>						
Initial	210,479	2,333	5,871	202,275	- 15	+ 7
20-Year	283,244	2,333 ^{3/}	11,126	269,785	+ 15	+ 44
<u>Continue Present Management</u>						
Initial	210,479	0	20,679	189,800 ^{2/}	- 20	0
20-Year	207,696	0	17,896	189,800 ^{2/}	- 20	0
<u>No Livestock Grazing</u>						
Initial	210,479	All forage is available for wildlife & non-consumptive use.		0	-100	-100
20-Year	261,737			0	-100	-100
<u>Increased Livestock Use</u>						
Initial	210,479	2,333	4,038	204,108	- 14	+ 8
20-Year	293,667	2,333 ^{3/}	4,038	207,296	+ 16	+ 46
<u>Reduced Livestock Use</u>						
Initial	210,479	2,333	32,224	175,922	- 26	- 7
20-Year	285,697	2,333 ^{3/}	40,415	242,949	+ 2	+ 28

^{1/} Includes forage not allocated because of lack of water, May 15 turnout dates and/or conflicts with wilderness recommendations (See Appendix B).

^{2/} This alternative assumes that the 5-year average use of 189,800 AUM's would continue although the current active grazing preference would remain at 238,214 AUM's.

^{3/} This allocation is based on 1990 management goals. As additional vegetation becomes available, wildlife forage allocations would be increased. A 20-30% increase is expected by the end of the 20 year period. The actual allocation levels would be based on resource needs, planning decisions made after consultation with the Idaho Department of Fish and Game. The additional forage allocated to wildlife would reduce the forage allocated to livestock by the same amount.

The initial livestock allocation figures on Table 2-1 represent the total amount of forage which could be properly used by livestock provided allotments are adequately watered. Current inventory information is not available to delineate range potentially suitable due to lack of livestock water on most allotments. Therefore, the initial allocation is based on the total amount of vegetation present. The 5-year phase in period, described below, would ensure that livestock use is within the carrying capacity. Suitability estimates due to lack of water were incorporated into the initial allocation figures for allotments 629, 802 and 808.

On allotments where forage is available but not useable by livestock due to lack of water, adjustments in the initial allocation would be made. The adjustments would be based on a 5-year phase-in of stocking rates based on monitoring studies. This phase-in procedure would be initiated immediately after a grazing use decision is issued. During the first year of this period no more than a 15% adjustment (either increase or decrease) from the 5-year licensed use (Table 2-1) would be implemented. This change would be evaluated until the third year. Further adjustments if necessary, would be made the third and fifth year of the phase-in period. By the end of the fifth year, the final stocking rate would be established.

Thus, if significant acreage within an allotment is unwatered, the associated AUMs would be deducted to arrive at the final stocking level by the end of the 5-year monitoring period. This process would be followed on allotments showing reductions as well as on allotments with increases. For example, additional AUM's may be deducted from an allotment already showing a reduction if unwatered areas are present. As water is developed during the 5-year period, the reduction would be lessened. It is anticipated that most water development would be completed within this 5-year period.

Water development is proposed on these unwatered areas as a means of improving livestock distribution and utilization patterns. Water development would allow grazing systems to be implemented which would benefit range conditions throughout the allotments.

This 5-year phase-in of adjustments along with the monitoring process would be completed with consultation and coordination with affected permittees and other interested groups in accordance with 43 CFR 4110.3.

Some allotments on Table 2-1 show proposed increases in livestock use even though a large portion of the allotment is in poor range condition. In some of these allotments, seeding projects have been completed in the last 10 years and the additional forage has never been adjudicated (i.e. the Center Allotment). Also, in most cases, the pastures in an allotment in poor range condition showed a reduction in livestock use. Within these allotments, there are pastures in fair and good range condition where increases in AUMs outweighed the reductions indicated in the poor range condition pastures. Thus, an overall increase in AUMs resulted even though sizeable reductions were indicated on a pasture basis.

Livestock Grazing Management

Two levels of management are proposed. Intensive management would be applied to 25 allotments (1,930,741 acres) and less intensive management would be applied to 24 allotments (448,273 acres) (Map 2-1). These management levels are proposed as a means of improving resource conditions and protecting high resource values. Establishing two management levels allows management emphasis to be placed where the highest resource values and conflicts exist. The term intensive management does not mean heavy use or dominant use by livestock.

Intensive management allotments are predominantly public land, have high resource values or exhibit a high potential for increased forage production and improvement in range condition. Allotment management plans (AMPs) incorporating specific grazing systems, levels of grazing use, season-of-use, range improvement projects and multiple use objectives would be prepared and implemented following completion of the EIS and Land Use Plan. In general, deferred use (2-4 pastures) systems would be developed in allotments currently used in the spring and fall. On summer use areas, deferred or rest rotation systems would be considered.

Rotation grazing systems have been identified for the Owyhee Resource Area portion of the study area. These systems are as follows:

Allotment

Garat - 584	Three pasture rest-rotation spring system and two pasture deferred rotation summer/fall system.
"45" - 629	1) <u>Nouque and Pedroli Portion</u> Three pasture rest-rotation for Nouque and Pedroli area. 2) <u>Glanville Portion</u> One pasture season long for winter area, one pasture deferred until after seed ripe for fall pasture, and two pasture rest-rotation for spring area.
Roaring Springs - 636	Two pasture rest-rotation system.
Garat Ind. - 524	One pasture spring/fall rotation.

Grazing systems rest the range from grazing at suitable intervals dictated by the growth requirements of key forage plants. They are designed to counteract the effects of selective grazing by livestock. These systems would allow desirable forage species to recover vigor, produce seed and establish new seedlings (Stoddart, Smith, and Box 1975). Consultation with allotment permittees and other interested parties would be an important part of the AMP development process.

Less intensive management would be applied to 24 allotments because of the small size or poor site potential of these allotments. AMP's would not be developed, however, grazing systems could be. These allotments could be moved into the intensive management category in the future.

As allotment management plans are implemented, season-of-use dates would be adjusted to satisfy watershed requirements, plant maintenance requirements and wildlife needs.

Wildlife Constraints and Coordinating Measures

The fish and wildlife values in the EIS area are significant. The importance of various habitats and the existing and potential impacts of livestock grazing to these habitats were recognized in the land use plan (MFP Step 2). The constraints and coordinating measures developed in that document are incorporated as part of the proposed action. Some of the more significant constraints and measures are discussed below. Others are described in the Project Development and Standard Operating Procedures sections.

Measures to Protect Birds of Prey Habitat

Portions of both the Kuna and Bruneau Planning Units are withdrawn to be managed as the Snake River Birds of Prey Area (SRBOPA) Map 2-2. These lands are to be managed under multiple-use principles, with raptor ecosystem management the primary objective and other resource uses allowed, if compatible with maintaining the raptor population. Livestock grazing is a historical compatible use; however, either changes in range management practices or development of range improvements would first be considered as to their effects on the birds of prey ecosystem. Proposed range improvement projects that may conflict with birds of prey would be modified, redesigned or not constructed.

Habitat alterations within three miles of any golden eagle or prairie falcon eyrie would be designed to accommodate the prey habitat needs for these species.

Rangeland reseeding would provide a mixture of grasses, forbs and shrubs to support prey populations for raptors.

Measures to Enhance Existing Bighorn Sheep Habitat

The canyonlands of Little Jacks, Battle Creek, Deep Creek and the Owyhee River would be managed for bighorns and other wildlife. Livestock use of these areas would be prevented by salting or development of water away from canyon areas or by fencing. Where livestock water is needed, water gaps would be provided.

A separation of use between cattle and bighorns would be maintained by not developing livestock water sources within bighorn habitat unless the potential adverse impact to bighorn sheep can be avoided or mitigated.

The conversion of existing cattle licenses to domestic sheep licenses would not be allowed if the domestic sheep would graze within one mile of bighorn sheep habitat.

No roads would be constructed into any proposed range improvement site within bighorn sheep habitat.

The Battle Creek bighorn sheep herd area would be established as a key management area for improvement of bighorn sheep habitat. Livestock grazing systems and season-of-use dates would be established to meet bighorn sheep requirements.

Measures to Improve Mule Deer Habitat

Within important mule deer habitats, livestock grazing systems would be implemented that recognize the physiological requirements of key forbs and shrubs needed by mule deer. Utilization of key shrub and forb species by all classes of animals would be limited to proper use. On mule deer winter ranges utilization of shrubs by livestock would be limited to 30%, thereby leaving 20% of the available annual production for wintering deer.

Vegetative treatments on deer ranges dominated by juniper and big sage sites would be designed to achieve a ratio of 60% forage to 40% cover. Such treatments, also, would not exceed one-fourth mile in width, and the optimum would retain continuous zones of interconnecting cover (600-1,200 feet wide) as well as associated cover patches of six to 26 acres. Treatment of bitterbrush and mountain mahogany stands will not occur unless the treatment is designed to improve the vigor or composition of these important browse plants.

Measures to Improve Antelope Habitat

Vegetative treatments on antelope ranges would be designed to maintain a 5-20% canopy cover of shrubs. Manipulations on winter ranges and spring fawning habitats will not occur unless the treatment is designed to improve antelope habitat. Any range seeding project in antelope habitat, including fire rehabilitation will include a mixture of shrubs, forbs, and grasses.

The improvement of crucial antelope winter/early spring ranges is recognized as a priority management need. Livestock grazing management of these antelope winter/early spring ranges will be designed (system and season of use) to improve habitat conditions for wintering antelope.

Measures to Improve Sage Grouse Habitat

Vegetative treatment projects within two miles of known strutting grounds would be limited to practices which also enhance sage grouse habitat, since these areas constitutes the breeding complex for sage grouse.

The density of the sagebrush canopy cover would be maintained at 20-30% within nesting habitats and at least 20% in known wintering

habitats. In brood rearing areas, the sagebrush canopy coverage would not be reduced below 10%.

Improve meadow herbaceous vegetation, especially forbs, by establishing rest or deferred grazing systems on the critical brood rearing areas. If grazing systems do not improve the situation, large meadow complexes may be fenced and excluded from grazing or have special grazing management applied (e.g. use only after seed ripe).

Measures to Protect or Enhance Riparian or Fisheries Habitat

Upgrading fisheries habitat condition for red band trout and riparian associated wildlife has been identified as the primary management objective on 153 stream miles. These streams were selected from the stream miles that support red band trout (281 of the 457 stream miles supporting fisheries habitat condition). These 153 stream miles are in poor or fair condition, are receiving heavy livestock use and have a high potential for improvement. The remaining areas supporting red band trout (128 of the 281 miles) were not identified for special management practices because some are in fair or good condition and do not receive heavy livestock use because of topography, season-of-use or other factors. Others are in poor or fair condition but are intermingled with private or state land and it would be difficult to apply the management measures prescribed for the 153 stream miles. Also, off site impacts from some non-federal lands would reduce the beneficial improvement efforts on BLM lands. Areas that do not support red band trout (176 miles of the 457 miles) were not included for special fisheries habitat management because of restrictive fisheries habitat conditions (intermittant water flows or high sediment yields from non-federal lands).

The 153 miles include portions of the Owyhee and Bruneau Rivers, Shoofly Creek, Big Jacks Creek, Cottonwood Creek, Duncan Creek, Sheep Creek, Battle Creek, Pole Creek, Bull Creek, Poison Creek, Birch Creek and several others. The specific management proposal to meet the land use plan objectives would be determined as allotment management plans or wildlife habitat management plans are developed. The following management practices could be initiated on these stream miles in order to ensure their improvement:

- 1) Grazing exclusion,
- 2) rest rotation or deferred rotation grazing systems,
- 3) limited season-of-use,
- 4) placement of juniper trees along stream banks to increase cover and reduce livestock trampling (Map 2-3),
- 5) salting livestock away from riparian areas, and
- 6) increased water development away from riparian zones.

Approximately 107 miles of the 153 stream miles are within narrow deep canyons. It is anticipated that grazing exclusion is the only practical method to accomplish riparian habitat improvement on these streams. This would be accomplished primarily through gap fencing of livestock access points.

If intensive livestock management practices are implemented as the primary method to improve fisheries habitat condition resource response would be carefully monitored. If habitat condition objectives are not being met, livestock would be excluded. Where grazing is excluded livestock use could be reintroduced after the time period required to bring habitat conditions to an upward trend and fair to good condition. Livestock use could then continue as long as these conditions were maintained.

In addition to the 153 stream miles identified for fisheries habitat improvement, 125 miles of stream and canyonland would be reserved for bighorn sheep, river otter, waterfowl and other riparian associated wildlife. Livestock use of these areas would be prevented by fencing, salting or development of water away from canyon areas. Management of stream miles is shown on Map 2-1.

Measures to Protect or Enhance Cultural Resources

Livestock grazing would be excluded from several cultural resource sites currently being impacted by livestock (Map 2-1). Sites which would be excluded from grazing include:

- 1) Deer Water Spring,
- 2) Hole-in-Rock Spring,
- 3) Indian Bathtub,
- 4) specific sites within the Camas Creek/Pole Creek Archaeological District and Black Butte/Guffey Butte Archaeological District, and
- 5) designated sites currently not named.

Remaining segments of the Oregon Trail and the associated Goodale's Cutoff and Kelton Road that contain well-preserved ruts or a low-standard two-track road would be preserved in their present condition. Motor vehicle use would not be allowed on undisturbed ruts without special authorization. Limited motorized use could occur on historic trail segments that are low-standard roads, if historic values would not be damaged. Heavy equipment or tracked vehicles would not be allowed along historic trail segments.

Scenic corridors with an average total width of 1/2 mile (1/4 mile each side) along remaining historic trail segments would be preserved in their present condition. The width of the corridors would vary depending on topography and the presence of private land and improved roads. Within the scenic corridors, range improvements and livestock controls

would be located and designed to minimize conflicts with scenic and historic resources.

In the event a new fence would cross a historic trail segment, every effort would be made to route the fence across a disturbed portion of the trail. Fences which must cross trail remnants would cross the trail and scenic corridors at right angles. Necessary gates and/or cattleguards would be installed.

If no alternative exists, livestock water may be developed within historic trail corridors. These would be located and designed to minimize visual disturbance and to avoid livestock trailing and trampling of trail remnants. Since all remnants of the Oregon Trail have been determined eligible for the National Register of Historic Places, the National Advisory Council on Historic Places would be consulted on all projects affecting the trail.

Measures to Protect or Enhance Watershed Values

Increases in livestock use would not be allowed if increased use would be detrimental to stream bank stability.

Project Development and Land Treatments

Over the years, a network of range improvements has been developed to facilitate management of grazing livestock and to improve rangeland resource conditions (Map 2-4). This network includes:

687 miles of fence	40 cattleguards
123 spring developments	60 miles of pipeline
279 reservoirs	15,600 acres of brush control
Five wells	115,000 acres of seeding

Additional fencing, water development and vegetative treatment practices are proposed to improve resource conditions and implement grazing systems. They are needed to achieve better distribution of livestock, increase livestock forage production, improve watershed condition, and improve the condition of areas for wildlife.

Estimated development needs would be as follows:

200 miles of pasture fence	Eight water catchments
50 miles of exclosure fence	75 cattleguards
125 spring developments	105 miles of pipeline
235 reservoirs	234,000 acres of brush control
Six wells & storage tanks	42,300 acres of brush control & seeding

Included in the above development needs is a proposal to construct 19 miles of pipeline between Big Jacks and Little Jacks Creek as shown on Map 2-5. It would make available 2,332 AUMs of livestock forage which is currently not allocated because of lack of water. Construction costs for the pipeline would be approximately \$102,000 for BLM and \$54,000 for the livestock permittees. BLM costs would primarily be material associated and permittee costs would primarily be labor associated. Annual

operating costs would be approximately \$6,500, which would be born by the permittees. A 20 KW diesel generator with a 7 1/2 horsepower submersible pump would be used to pump water from an existing well to a storage reservoir on Sugar Loaf Butte. About five miles of four inch PVC pipe, installed with either a trencher or backhoe, would be required to complete this portion of the pipeline. Some blasting and roadwork would be necessary at the rim on Sugar Loaf Butte.

The storage reservoir dimensions would be 100' x 100' sides with a four to six foot high embankment. The sides and bottom of this reservoir would be lined with PVC sheets to prevent leakage. About 500,000 gallons of water would be stored. This would be enough water to meet the water needs of 2,000 cattle for 10 days if the pumping facility failed. Soil from the area immediately surrounding the reservoir (one acre) would be used to build the embankment.

Three pipeline laterals (14 miles) would be laid using a caterpillar tractor with a pipelayer attachment. Water from the storage reservoir would be gravity fed into these lateral lines. Black poly pipe (1 1/2 to 2 inch diameter) would be "ripped" into the ground to a depth of about 20-30" depending on soil depth. Some trenching and/or blasting may be required on shallow areas. Thirteen livestock watering troughs and 13 wildlife guzzlers would be installed on these laterals. The troughs would have float valves to prevent unnecessary loss of water.

Water would remain in the wildlife guzzlers during the summer months when the pipeline is not in use. Generally the pipeline would provide water for livestock from April 1 to June 15 and September 1 to October 30. Exact dates would not be determined until the development of allotment management plans for the Battle Creek and Northwest Allotments.

The specific location of other projects would be determined as AMP's are developed. The location of potential land treatment areas is shown on Map 2-6 and the acreage of potential land treatment by allotment is shown on Table 2-3.

Table 2-3
Proposed Land Treatments - Proposed Action

Allotment	Brush Control (acres)	Brush Control & Reseed (acres)
524 Garat Individual	500	0
584 Garat	116,700	500
629 "45"	67,400	0
636 Roaring Springs	2,600	0
801 Castle Creek	2,000	11,200
802 Battle Creek	10,800	1,800
803 Big Springs	8,800	400
804 Bennett	900	1,000
805 Riddle	12,000	9,700
808 Northwest	1,200	700
809 Center	800	0
812 Miller Table Seeding*	0	1,100
813 Mtn. Home Subunit	800	0
814 Long Tom Subunit	1,600	0
817 Martha Ave.	0	600
820 Cornell	500	1,100
840 Strickland-Hall-Yates	800	0
842 M & L	0	1,200
843 Simplot	1,700	7,500
844 Tindall & Sons	800	3,000
845 Antelope Creek	900	700
846 Alzola	3,200	1,800
Total	234,000	42,300

* Less intensive allotments

Proposed project developments would cost approximately \$2.9 million. Proposed and existing project developments would be periodically maintained as described in Table 2-4.

Table 2-4
Implementation and Maintenance Cost - Proposed Action

Project	Proposed Units	BLM Cost	Rancher Cost (primarily labor)	Existing Projects	Maintenance Responsibility of Existing Projects*		Annual BLM Maintenance Cost	Annual Rancher Maintenance Cost
					BLM	User		
Pasture Fence (miles)	200	240,000	160,000	683 mi	166 mi	517 mi	2,490	10,755
Exclosure Fence (miles)	50	100,000	0	4 mi	4	0	810	0
Spring Development	125	75,000	63,000	123	55	68	2,750	9,650
Reservoir	235	176,000	176,000	279	80	199	1,500	8,680
Wells	6	90,000	0	5	2	3	40	180
Water Catchment	8	160,000	0	0	0	0	0	600
Cattleguards	75	202,000	38,000	40	30	10	450	1,275
Jacks Creek Pipeline	19	102,000	54,000	0	0	0	0	190
Other Pipelines	86	172,000	215,000	60 mi	22	38	220	1,240
Brush Control (acres)	234,000	682,000	475,000	15,610	All		Unknown	Unknown
Brush Control & Seeding (acres)	42,300	894,000	170,000	114,574	All		Unknown	Unknown
Total Costs		2,893,000	1,351,000				8,360	32,570

* Livestock operators would maintain all new projects except stream exclosure fences.

Project Development and Design Criteria

Fences - Fences would be constructed to establish allotment boundaries, divide allotments into pastures, and where necessary, to exclude livestock from springs, reservoirs and selected streams. Fences would be constructed to permit deer and antelope passage. Existing management fences that create wildlife movement problems would be modified on a priority system. Fence posts would be a solid nonreflective color to minimize visual impacts. Proposed fence lines would not be bladed or scraped. Cattleguards would be installed where fences cross heavily traveled existing roads.

Spring Development - Water would be collected at the spring source by installing perforated pipe and collection boxes and piped approximately 100 feet to water troughs for livestock use. Live water would be provided for wildlife. Approximately 90% of the spring developments would be fenced. Springs would not be fenced where it is physically impossible due to steep or rocky terrain. Where necessary to maintain water at the spring source and protect riparian habitat, float valves would be installed to prevent constant drainage. Springs that do not have sufficient flow to supply both livestock and wildlife water would not be developed.

Reservoir Development - Dams would be constructed on or adjacent to ephemeral drainages to impound runoff water for livestock and wildlife. Water storage capacity would range from one to two acre-feet. Fill material would come from the impoundment area if possible. Where possible, reservoirs would be fenced, with water piped to troughs for livestock use, or gap fenced. Reservoirs built in association with seep

areas would be constructed below the site to prevent loss of the riparian zone.

Pipeline Development - Pipelines would be developed to carry water from wells, springs or streams to areas with inadequate water. A storage tank or reservoir is generally located at the water source or at a high elevational point. Provisions would be made to avoid dewatering natural water sources.

Construction would consist of burying a plastic pipe approximately twenty inches below the ground. Pipelines are installed in two ways. On deep soils, a trenching machine is used to dig the trench, lay the pipe, and cover it with soil in one pass. The soil is mounded on top of the trench to minimize the depression after settling. A second method may be used in isolated instances when soil depth is limiting (less than 20"). A trench is opened, the pipe is laid, and the soil is mounded on top in three separate steps. Because of the limiting soil depth, topsoil is borrowed from an area approximately ten feet on either side of the trench. The trench opening averages two feet for each method. Water would be provided approximately every mile along the pipeline for livestock and wildlife. To provide water for wildlife that become dependent upon the new sources, pipelines would remain charged with water during the dry season or an alternative water source would be provided.

Water Policy

A policy statement from the Idaho State Director of the BLM dated May 25, 1982, states that all new filings for water permits in Idaho will be reviewed to determine if a livestock operator should be made part of the water application. The following procedures apply:

- 1) If a permittee is developing a water source on public lands entirely at his own expense through a Section 4 permit, the permittee should obtain permission from the State of Idaho and should hold the water right in his own name unless the source rises and falls completely on public lands (see private waters below). By obtaining a Section 4 permit the operator gains title to the water development.

Where water sources not wholly located on public land are to be developed in this manner, the manager should make certain that sufficient water is available to meet requirements of the area's land use plan. This might include water from the source that is used by a permittee other than the one developing the source. This is done to prevent one operator from controlling an important water source to the detriment of other public land users.

If these conditions are met, the Bureau can allow a Section 4 permit and should not protest the water right application. It is preferable, however, to have a cooperative agreement allowing for the long-term use of the water source, but this should not be made a condition of the Section 4 permit unless agreed to by the permittee.

In the case where the water source is not on public land and the permittee is developing it to meet the Bureau's land use planning objectives, the following should be attempted: a) obtain some type of long-term agreement, b) if a long-term agreement is unacceptable, the Bureau should plan for an alternative source of water for use when the permittee's development becomes unavailable.

Private waters--Under State law a private water is not subject to appropriation without permission of the landowner. A private water consists of the water of a pond, spring, pool, or diffused source contained wholly on a landowner's property (see State of Idaho Water User's Handbook). This also applies to public lands, and therefore, water sources contained wholly on public lands are not subject to appropriation without the Bureau's permission. A permittee can be allowed to develop these waters but not to the extent that it interferes with long-term land use planning objectives. These types of waters are property of the United States, and therefore a cooperative agreement (not a Section 4 permit) should be used.

- 2) If a cooperative agreement has been prepared for development of a water source, the permittee may elect to have his name included on the permit.

Land Treatments

Approximately 276,300 acres of native range would be treated to reduce the invasion of sagebrush, juniper and annual grass species, improve ecological condition and increase forage production. This treatment would consist of 234,000 acres of brush control and 42,300 acres of brush control and reseeding (Table 2-3).

Vegetative treatments would be restricted to areas in poor or fair range condition. Native range which is in good to excellent range condition would not be treated. Land treatment projects would be applied to sites which receive greater than 10" of precipitation and have soils with high productive potential. Areas with low productive potential are often dominated by cheatgrass and competition limits the success of land treatment projects. In addition, treating these sites is very expensive. It is felt that funds should be spent in areas where chances of successful land treatment projects are greater. Areas with high or critical erosion potential, unstable slopes, and where soil surveys indicate low success probability would not be treated.

During the activity planning process, site specific areas, acreage, and treatment techniques would be selected. In general, burning for brush and juniper control would receive first consideration. Where burning is not feasible (lack of ground fuel, unstable weather conditions, etc.) chemical treatment or chaining would be employed. Plowing and seeding would only be used when the treatment site is depleted and the potential for native grass recovery is poor. In those cases where reseeding (drill or broadcast) is necessary, native or introduced species may be selected depending on management objectives. Vegetative treatments would adhere to the following stipulations;

- 1) If pesticides/herbicides spraying techniques are used for treatment of native rangelands, a buffer zone of 150 feet would be established around perennial streams and riparian habitat areas. The effect of the pesticide/herbicide should not be evident within this area.
- 2) In areas identified as winter range for mule deer, antelope and sage grouse, allow for a sufficient forage to cover ratio that would meet these species needs.
- 3) Projects would be designed with irregular control lines, feathered edges and natural contours. Drainages and occasional brush islands would be left untreated on sites treated by mechanical or other means.

Standard Operating Procedures - The following procedures would be followed in the construction of all management facilities and vegetative treatments:

- 1) Roads or trails to new construction or project sites would not be allowed where existing roads and trails could be utilized or where off-road vehicles could be used. Roads would not be built into any proposed range improvement site within bighorn sheep habitat.
- 2) Class III Cultural Resource Inventories would be performed at all project locations. The Class III Inventory is an intensive field inventory which includes but is not limited to the following procedures:
 - a) Review of existing cultural resource site records for the area of impact.
 - b) Conducting a on the ground survey of the project area, using a valid rationale for intensity of coverage.
 - c) Complete recordation of all cultural sites identified in the project area.
 - d) Mitigation of negative impacts to significant cultural sites, most often achieved through avoidance, but sometimes through salvage excavation.
- 3) Before substantial (>10%) increases in livestock grazing occur in high cultural site density zones, those areas adjacent to existing water sources would be examined at a Class III Inventory level.
- 4) All sites listed or eligible for listing on the National Register of Historic Places would receive special consideration as mandated by Section 106 of the National Historic Preservation Act and 36 CFR 800. These procedures include consultation with the Advisory Council on Historic Preservation to determine project impacts to cultural sites and development of acceptable mitigation of adverse impacts.

- 5) Project clearances for Threatened and Endangered species would be conducted on all project sites.
- 6) No action would be taken that would impair any wilderness study areas suitability for wilderness designation.

Land use plan recommendations have recommended about 315,500 acres as "suitable" for wilderness. Grazing actions proposed within these areas would be consistent with the BLM's Interim Management Policy for areas under wilderness review.

Activities or facilities established prior to wilderness designation would remain and may be replaced when necessary to properly administer the grazing program. The construction of new improvements would be primarily for resource protection and more effective management of these resources rather than to accommodate increased numbers of livestock. The numbers of livestock permitted to graze in wilderness would remain at the approximate level at the time of designation, unless it can be conclusively shown that increased livestock numbers would have no adverse impact on wilderness values.

All areas subject to wilderness review would be managed under the BLM's Wilderness Interim Management Policy (IMP) until released from the wilderness process. Proposed projects would be modified or deferred if necessary to assure compliance with Wilderness IMP.

- 7) All actions would be designed to address BLM Visual Resource Management criteria. Project developments would be designed to minimize adverse visual impacts.
- 8) Wildlife escape devices would be installed on all troughs and tanks.
- 9) In crucial wildlife habitats (winter ranges, raptor nest sites, strutting grounds, etc.), construction work on range improvements would be scheduled to avoid or minimize disturbance to wildlife.
- 10) Areas disturbed during project construction would be reseeded with a mixture of grasses, forbs and shrubs.
- 11) All actions would be designed to minimize adverse impacts to the soil, water and air resources.
- 12) As elements within the proposal are implemented, an environmental assessment would be made to assess any site specific impacts that are not addressed in this EIS.
- 13) A portion of the land within the EIS area is being considered for agricultural development. If current land ownership or use changes because of this or other land actions, livestock use would be adjusted accordingly.

- 14) Benefit/cost analysis would be a component of environmental assessments on Allotment Management Plans.

Implementation Schedule

Adjustments in livestock use levels would be made following completion of the EIS and Land Use Plan. A 5-year phase-in of the proposed increase or reduction would be initiated. A range monitoring program (actual use, forage utilization, and range trend studies) would be used to arrive at final livestock use levels by the end of the fifth year. This procedure would allow inventory results to be adjusted, if necessary, to arrive at a biologically sound, balanced forage allocation figure.

We anticipate that during the 5-year phase-in period there would be the following livestock AUMs authorized:

<u>Year 1</u>	<u>Year 3</u>	<u>Year 5</u>
187,000-196,000	186,000-195,000	196,000-202,000

Large livestock increases would not be allowed as long as water developments were not adequate for good livestock distribution and the development of management plans. Also, potential conflicts with wildlife would be considered before developing water sources in all areas that do not currently have water.

The following allotment ranking represents the priority order for the Bruneau Resource Area by which allotments would be selected for the development of Allotment Management Plans (AMPs) and establishment of monitoring studies.

- | | |
|--------------------------------|------------------------------------|
| 1. Battle Creek (802) | 12. Tindall and Sons (849) |
| 2. Big Springs (803) | 13. Strickland, Hall & Yates (840) |
| 3. Northwest (808) | 14. Antelope Creek (845) |
| 4. Riddle (805) | 15. M & L (842) |
| 5. Castle Creek (801) | 16. Bennett (804) |
| 6. Alzola (846) | 17. Scotts Table (810) |
| 7. Center (809) | 18. Mud Springs (815) |
| 8. Mountain Home Subunit (813) | 19. Cornell (820) |
| 9. Long Tom (814) | 20. Martha Avenue (817) |
| 10. Ditto Creek (818) | 21. Dive Creek (819) |
| 11. Simplot (843) | |

Criteria used to develop this ranking included, wildlife uses/conflicts, watershed values, public interest, potential for range improvement through better range management practices, and economic impacts of proposed reductions on livestock operators. Development of AMP's and establishment of monitoring studies would be completed on as many allotments in the intensive management category as funds and manpower would allow each year.

Development of AMPs and proposed projects would be completed during the 10 year period following completion of the EIS. It is anticipated

that water would be developed within the first five years. The priority for implementation would be as follows: development of AMP's; water; fences; and land treatments.

Implementation of Projects Within Wilderness Study Areas

The stipulation that all wilderness study areas would be managed under the Wilderness Interim Management Policy (IMP) until they are released from the wilderness review process would delay the implementation of some portions of the proposed action. Based on the analysis of impacts in Chapter 4, the following activities would be affected:

Project Development - New range improvements within WSAs would be limited to those that enhance wilderness values by better protecting the rangeland in a natural condition. In addition, new range improvements must not require motorized access for maintenance, must be substantially unnoticeable, and must not degrade the wilderness values compared to the area's values for other purposes. This requirement could delay or prevent construction of some projects, particularly those impacting the 48,000 acres of good condition range identified by wilderness as having special scientific and ecological values. Some AUM increases could also be affected since some increases are dependent on the development of water sources in unwatered areas. Specific projects would be evaluated through the Environmental Assessment process to assure they conform with the Wilderness Interim Management Policy.

Big Jacks/Little Jacks Pipeline Proposal - The object of the Wilderness Interim Management Policy (IMP) is to preserve the wilderness suitability of potential wilderness areas prior to a Congressional decision on formal wilderness designation. According to the IMP, wilderness suitability means two things: 1) preserving the wilderness characteristics of an area; and 2) maintaining the relationship between an area's wilderness values and its values for other uses.

Construction of the 19-mile pipeline could impact the wilderness suitability of the adjacent Big Jacks Creek and Little Jacks Creek WSAs. Not only would their wilderness values be reduced but the relationship between those wilderness values and livestock forage production values would be altered. The impacts of this pipeline could be significant enough to affect the Congressional decision on the suitability of the adjacent WSAs as designated wilderness.

Pipeline construction and subsequent increased grazing would reduce the wilderness values of 7,900 acres in the Big Jacks Creek and Little Jacks Creek WSAs. These are areas in good range condition within two miles of the proposed pipeline. Portions of these areas are being recommended as suitable for wilderness primarily because of their ecological values. Increased livestock grazing would decrease their value as wilderness. The specific impacts of increased grazing on the wilderness values of these areas are discussed in the Draft EIS under environmental consequences to the Proposed Action.

The 19-mile pipeline would also alter the existing relationship

between wilderness values and livestock forage production values throughout the plateau between Little Jacks Creek and Big Jacks Creek. Once the 19 miles have been completed, livestock forage values in all areas potentially accessible by spur lines would be substantially enhanced. This could shift the resource balance in these areas from one favoring wilderness designation to one favoring maximum forage production and use.

The pipeline would be further evaluated to determine if it conforms with the Wilderness Interim Management Policy.

Vegetation Manipulation - Brush control, seeding, spraying projects and controlled burning identified on page 4-17 would not be done until a site specific environmental analysis clearly shows they comply with the Bureau's Interim Management Policy and Guidelines-nonimpairment criteria as set forth on pages 23 and 24 of this handbook dated December 12, 1979.

Monitoring Programs

Studies and evaluation procedures would be initiated in accordance with BLM Manual, Section 4430, to determine if the MFP and specific allotment objectives are being met. These studies would include compilation of actual use, range trend, range/watershed condition, watershed quality, utilization, weather data, carrying capacity, and wildlife habitat conditions. The study site would be selected and read cooperatively with livestock operators and other interested agencies where possible. Where specific objectives are not met, adjustments in season-of-use, livestock numbers (including removal) or grazing system would be made depending on the indicated need.

Utilization studies would be conducted using the key forage plant method (BLM Manual 4430). This method establishes key vegetative species and key areas that would be monitored for utilization. Key areas would be selected to allow management objectives to be monitored. For example, on areas where improvement of riparian or fisheries habitat conditions is the primary objective, the riparian zone would be established as the key area and would be monitored accordingly. On other areas or allotments, the key area may be selected to represent the majority of the grazing area within the allotment. Key species to be monitored may include but not be limited to bitterbrush, Idaho fescue, and bluebunch wheatgrass.

Monitoring studies (utilization and trend) would not be performed on less intensive allotments if manpower dollars are limited. However allotment inspections would still be performed on less intensive management allotments until monitoring studies were established.

Table 2-13
Planning System Recommendations/EIS Relationship for Bruneau/Kuna Planning Units and Garat and "45" Allotments
(BPU-Bruneau Planning Unit, KPU-Kuna Planning Unit)

Objective #1 (Range) - Develop range programs and management techniques to: a) increase the vigor, density and production of desirable vegetation on 745,512 acres of public lands within 20 years. b) Increase 532,855 acres in poor to fair condition; 448,698 acres from fair to good condition; maintain condition class of 338,716 acres currently in good and excellent condition and maintain and/or improve 313,233 acres currently in a disturbed, burned or seeding condition within 20 years. Maintain condition class of 3,330 acres currently in good condition. c) Increase total forage production from 210,479 AUMs to 283,244 AUMs within a 20 year period. d) Increase livestock use from 202,275 AUM's to 269,785 AUMs within 20 years.

Rationale - The primary rangeland management program goal is to protect and manage the vegetative resources and to improve current range condition and trend by increasing the amount and quality of desired vegetation. The objective cannot be met without effective administration and intensive management.

Single Use Recommendations (MFP-1)	Other MFP-1 Resource Management Recommendations which Conflict	Multiple Use Recommendation (MFP-2)	Rationale for the M.U. Recommendation	Resource Trade-offs
<p>A. (RM-1.1, ORA: RM-2.4, 1.1) Reduce the amount of poor condition range-lands in area by:</p> <p>a) Intensively manage 25 allotments (1,930,741 acres of public land)</p> <p>b) Applying less intensive management of 24 allotments (448,273 acres of public lands).</p>	<p>A. Intensive management is supported by wildlife, fisheries, watershed & cultural resources as long as vegetation is improved to a good ecological condition & it benefits fish & wildlife habitats & protects identified cultural values.</p>	<p>A. Accept recommendation as written.</p>	<p>A. The intensively managed allotments have potential for increased forage production which would improve range condition and trend & thereby improve overall ecological condition.</p>	<p>A. Developments for intensive management may affect the current naturalness of areas where no man made projects existed. Livestock grazing would increase in areas receiving water development projects. Such projects would also provide water needs for wildlife.</p>
<p>B. (RM-1.3) Deny requests for ORV races in pastures where livestock are grazing; close spring pastures from March 1 through June 15th or until livestock are removed.</p>	<p>B. Retain & designate most of area open to ORV use.</p>	<p>B. Work with organized ORV groups to conduct races away from spring pastures where high conflicts with spring livestock might occur particularly in Castle Creek & Battle Creek allotments.</p>	<p>B. Conflicts can be reduced with proper placement of ORV routes. Previous experience supports this.</p>	<p>B. Organized ORV use in areas having spring grazing use will be reduced. ORV use will be directed to other areas having considerably less conflicts.</p>
<p>C. (BPU & KPU: RM-1.4, ORA: RM-2.8) Develop livestock management facilities for implementation of AMPs and/or grazing systems as follows:</p> <p>250 miles of fence</p> <p>125 spring developments</p> <p>105 miles of pipeline</p> <p>275 watering troughs</p> <p>235 reservoirs</p> <p>6 wells & storage tanks</p> <p>8 water catchments</p>	<p>C. Minimize soil erosion by controlling grazing use & soil disturbance (WS-1.1, 1.2). Recreation values of Oregon Trail & potential wild rivers C.J. Strike Reservoir [SR Birds of Prey Area would be degraded (R-1.1 [1,2,4])]. Fences restrict ORV use (R-1.2 [5]). Water developments create forage competition in bighorn habitat (BPU: W/L-2.1). Water in developments may not be available to deer & antelope when needed; predation becomes a bigger problem around water developments (W/L-3.1, 3.3). Only springs capable of providing water for wildlife & livestock should be developed (W/L-4.3). Visual classification protection requires limiting restrictions on certain developments (VRM-1.1, 1.2, 1.3). Wilderness values are not to be degraded by developments (BPU: WN-1.1, 1.2, 1.3, 1.4, 1.5, 1.6, 1.7, 1.8, 4.2, 4.3).</p>	<p>C. Accept recommendation with the following stipulations:</p> <p>1) Avoid developing new water sources in bighorn sheep habitats.</p> <p>2) No roads will be constructed to any proposed range improvement sites within bighorn sheep habitat or wilderness areas.</p> <p>3) New water developments will satisfy both wildlife & livestock. Springs developed in riparian areas will be fenced & water piped away.</p> <p>4) Construction of range improvements in WSAs will be determined on a case by case basis.</p> <p>5) Visual contrast rating will be made on all projects in Class I, II & major projects in III & IV areas.</p> <p>6) No water developments constructed within 1/4 mile of Oregon Trail (topography permitting). Water developments located to minimize visual disturbance & avoidance of livestock trampling of trail remnants.</p> <p>7) Leave gates at likely ORV race trails, modify as needed.</p> <p>8) Construct 19 miles of Jacks Creek pipeline outside WSA boundary. Evaluate further development if not designated wilderness.</p>	<p>C. These management facilities are needed to improve vegetation to a good ecological rating within the 20 year period. The developments are also needed to improve forage production to the benefit of both wildlife & livestock. The stipulations are designed to minimize, reduce or mitigate adverse impacts expected to occur with the development of livestock management facilities.</p>	<p>C. Livestock use in bighorn sheep habitats will be restricted by location of water projects. Fencing will continue to be a hazard to certain wildlife but fence designs will be to BLM specifications. Riparian areas will be protected where new springs are developed by fencing & piping water; reduction of potential forage for livestock use would be lost. Visual & cultural resources will be impacted to a degree.</p>
<p>D. (RM-1.5) Adjust livestock season-of-use to meet minimum growth needs of preferred plants or forage species.</p>	<p>D. None</p>	<p>D. Accept as written</p>	<p>D. Adjustments of season-of-use will help increase production of desirable plant species & in turn improve site productivity & reduce erosion through increasing vigor, density & production of desirable plant species.</p>	<p>D. Season-of-use adjustments will result in some later turnout dates which in turn may reduce AUMs for livestock. This adjustment, however allows plants to reach [seed ripe stage - a condition necessary to improve maintenance of desired plant species, vigor & productivity].</p>

Table 2-13 (cont.)

Objective #2 (Range) - Over the next 15 to 20 years, treat 338,483 acres of suitable public land to increase forage production and reduce the acreage of range in poor condition.

Rationale - The identified public lands to receive land treatments have the capability to respond with increased forage production. Portions of 17 allotments are producing less livestock forage than the current class 1 demand. Land treatment is the only feasible method for range improvement on those areas in which the existing vegetation is predominately big sagebrush, cheatgrass and Sandberg bluegrass.

Single Use Recommendations (MFP-1)	Other MFP-1 Resource Management Recommendations which Conflict	Multiple Use Recommendation (MFP-2)	Rationale for the M.U. Recommendation	Resource Trade-offs
E. (BPU: RM-2.1) (KPU: RM-1.7) Treat (via spray, burn or shred) approximately 62,083 acres (in 18 allotments) of existing seeding to reduce invading brush species, improve forage production & range condition. Maintaining and/or expanding existing seedings will have preference over establishing new seedings.	E. Minimize soil erosion initial surface disturbance & vegetative cover loss (BPU: WS-1.2). Spraying chemicals near riparian habitat may destroy habitat & thereby effect fish populations via destroying food base (BPU: W/L-aq-3.4; KPU: W/L-aq-2.3). Treatment of seedings would reduce desired ratio levels which is critical on deer winter range (BPU: W/L-3.1; KPU: W/L-3.2). Vegetation manipulation on antelope winter & spring range would reduce desired shrub/forb composition (BPU: W/L-3.3; KPU: W/L-3.4). Avoid disturbance activities within 2 miles of sage grouse strutting grounds & wintering areas (BPU: W/L-4.6; KPU: W/L-4.4). Avoid treatment/disturbance activities around raptor nesting areas between 3/1 & 8/15 (W/L-5.1). Treatment of existing seedings would alter existing game species habitat & thus reduce numbers of available animals/birds for hunters (BPU: R-1.2[7]; KPU: R-1.2[12]).	E. The MFP-1 recommendation is accepted with the following stipulations added: 1) a 150 foot buffer around perennial streams & riparian habitat areas is established in which no chemical spraying will be used; 2) provide for sufficient forage to cover ratio to meet the winter range needs for mule deer, antelope & sage grouse.	E. Treatment of existing seedings is the most beneficial investment for improving desirable forage production. Livestock will remain longer in seeding areas thus improving vigor & density of late spring & summer range. The forage on later ranges would mature more thus improve both production & condition.	E. Provision of forage to cover ratio for wildlife will reduce an indeterminable amount of area to be treated. The overall net effect would improve forage & cover to benefit both livestock & forage.
F. (BPU: RM-2.2) (KPU: RM-1.8) Treat 90,200 acres (47,700 acres brush control; 42,300 acres brush control & reseed) of potentially suitable native rangeland to reduce invasion of less desirable brush & annual species, improve range condition & increase grazing capacity. (ORA: RM-2.5) Treat 203,000 acres (202,500 brush control & 500 acres brush control & reseed).	F. Vegetative manipulation within special recreation management areas (offering primitive & semi-primitive opportunities) would degrade natural values (BPU: R-1.1 [4]; KPU: R-1.1[3]). Vegetative manipulation could harm existing raptor habitat & nests & in turn adversely affect opportunities for viewing these birds (BPU: R-1.2 [8]). Brush control & reseed is prohibited in proposed wilderness areas & in areas under wilderness IMP (BPU: WN-1.1 thru 1.8, 4.1, 4.2). Vegetative treatments of native range in VRM Class II areas should appear as natural openings & follow existing breaks in vegetation & landform (BPU: VRM-1.2; KPU: VRM-1.1, 1.2). Treatment of native range & reseed will impact wildlife. Problems may arise with forage & cover needs of mule deer, antelope & sage grouse & must be coordinated (KPU: W/L-3.2, 3.4, 4.4). Use of chemicals near riparian habitats & steep sloped watershed may adversely affect aquatic species & habitat (KPU: W/L-aq-2.3).	F. Accept the MFP-1 recommendation with the following stipulations added: 1) A 150 foot buffer zone will be established around perennial streams & riparian habitat areas when chemical spraying is used to ensure protection of areas. 2) Ensure provision of sufficient forage to cover ratio to meet winter range needs of mule deer, antelope & sage grouse. 3) 900 acres of Big Springs Allotment (BPU) will not receive brush control & reseed as they lie within areas recommended as suitable for wilderness. 4) Projects will be designed with irregular contour lines, feathered edges & natural contours. Drainages & occasional brush islands will be left untreated on sites receiving mechanical treatments. 5) Primitive & semi-primitive classified areas will receive treatments in a manner to ensure that the landscapes appear natural to the casual observer.	F. The selected areas show the best potential for responding to vegetative manipulation. Adjustments in vegetative treatments are made to incorporate high wildlife, fisheries, visual, wilderness & recreation values.	F. A reduction of potentially treatable areas (approximately 16,800 acres) for brush control & reseed will occur. However, protection of valuable wildlife, fisheries, visual, wilderness & recreation areas will benefit all users. Beneficial impacts will occur to those sites in poor ecological condition which will receive treatments. Improved condition class will result as well as increased forage for both livestock & wildlife.

Objective #3 (Range) - Allocate livestock forage in each of the allotments within limits necessary to maintain and/or enhance the range and soils resource.

Rationale - Forage consumption by livestock must be balanced by forage production in order to properly manage the range resource. Proper allocation will ensure that preferred species are not used beyond their biological limits necessary for survival and reproduction.

Single Use Recommendations (MFP-1)	Other MFP-1 Resource Management Recommendations which Conflict	Multiple Use Recommendation (MFP-2)	Rationale for the M.U. Recommendation	Resource Trade-offs
G. (BPU: RM-3.1) (KPU: RM-2.1) Allocate 184,396 AUM's for livestock & 1,783 AUMs for wildlife. This figure reflects -8% average reduction from active preference (livestock). (ORA: RM-2.1a) Allocate 17,889 AUMs livestock & 550 AUMs for wildlife.	G. None	G. Accept MFP-1 recommendation as written.	G. Allocation of forage is based on range production. The overall condition of the range indicated a reduction of 8% from active preference was needed. Current BLM policy requires that forage allocation be made for wildlife as well as for livestock.	G. The reduction of allocation in allotments will result in opportunity for range in poor condition to improve & where treatments are applied, to respond. Allocation for wildlife recognizes & responds to the wildlife values & wildlife management goals of federal, state & sportsmen groups to the benefit of all interests.

Table 2-13 (cont.)

Objective #1 (Watershed) - Maintain stability of 660,000 acres of moderate, high, and critical erosion hazard classes by reducing or minimizing wind and soil erosion.

Rationale - The application of proper grazing management could effectively protect against soil loss. The maintenance of soil stability will be of benefit to the bureau's grazing, recreation, and fishery programs as well as improving aesthetic values. Achievement of this objective will reduce or prevent high sediment yields and dissolved solids in runoff water and enhance surface water quality for a variety of uses.

Single Use Recommendations (MFP-1)	Other MFP-1 Resource Management Recommendations which Conflict	Multiple Use Recommendation (MFP-2)	Rationale for the M.U. Recommendation	Resource Trade-offs
H. (WS-1.1) Minimize erosion by maintaining good perennial vegetation cover on all sites. Perennial native range should be managed to attain good ecological range condition.	H. Development of intensive range improvement projects will disturb soils initially during construction. Water developments for livestock use will have soil disturbance & erosion within 1/2 mile of the water (BPU: RM-1.4).	H. Do not allocate more than 50% of total annual growth of vegetation for consumptive use. Allocate less than 50% when special circumstances warrant. Good ecological condition may not be achieved through management or reseeding but should be guided to seek a soil surface factor (SSF) of stable to moderate.	H. Utilization of < 50% vegetation will help maintain healthy plants by allowing root systems to become well established & litter to accumulate thereby encouraging seed germination & minimizing runoff. Adjustments in vegetative use may be necessary on slopes greater than 20%.	H. Maintenance of the soil base is critical to providing future vegetative growth & range improvement. Reduction of vegetation use for grazing in critical slope areas are justified to protect watershed & improve condition.
I. (WS-1.2) Reduce soil erosion by minimizing all surface disturbance as follows: 1) Confine use of wet soils to such time that soil will support that activity without disturbing the root zone. 2) Specific recommendation to minimize soil disturbance are to be made through the EA process for project developments, land treatments, ORV activities, roads & trails.	I. Development of intensive range improvement projects will disturb soils initially during construction. Water developments for livestock use will have soil disturbance & erosion within 1/2 mile of the water (BPU: RM-1.4).	I. All projects will consider soil impacts both on & off site.	I. Proper timing of all activities with regard to soil moisture content & range plant readiness will serve to minimize soil surface disturbance & erosion.	I. Use of certain rangeland areas will be delayed until the range is ready to support those activities, this will help to maintain or improve range condition & cover. Later livestock turnout dates & relocation of ORV use for permit events will improve range condition.

Objective #2 (Wildlife-terrestrial) - Manage sensitive species habitat to maintain or increase existing and potential populations.

Rationale - These species are mutually designated by BLM and Idaho Fish and Game and, although not endangered or threatened, are of concern for their continued existence. Further population or habitat decline may result in the more restrictive listing.

Single Use Recommendations (MFP-1)	Other MFP-1 Resource Management Recommendations which Conflict	Multiple Use Recommendation (MFP-2)	Rationale for the M.U. Recommendation	Resource Trade-offs
J. (W/L-2.1) Manage 93,500 acres of bighorn sheep habitat to provide adequate food, cover, water & space for 400 bighorns by 1990.	J. Allocation of all available forage be allocated to livestock (BPU: RM-3.1). Extensive developments for intensive livestock management (BPU: RM-1.4).	J. Accept as written.	J. See paragraphs G & C above.	J. See paragraphs C & C above.

Objective #3 (Wildlife-terrestrial) - Manage 1,698,942 acres of big game habitat to obtain good ecological condition.

Rationale - Elk, mule deer and antelope are important big game species in the Bruneau Resource Area. Idaho Fish and Game goals/objectives are to increase deer and antelope populations approximately 20% by 1985. Deer populations are currently increasing while antelope populations are stable. Elk in limited numbers occur primarily in winter in the far northern boundary of the resource area.

Single Use Recommendations (MFP-1)	Other MFP-1 Resource Management Recommendations which Conflict	Multiple Use Recommendation (MFP-2)	Rationale for the M.U. Recommendation	Resource Trade-offs
K. (KPU: W/L-3.1) Manage 2,880 acres of elk winter & early spring range so there is adequate food, cover & water for 50 elk by 1990. Specifically, allocate forage by allotment, implement grazing systems which recognize physiological requirements of shrubs, allow livestock to consume no more than 30% annual production of key shrubs, provide mosaic patterns in treatment areas.	K. Allocation of all available forage be allocated to livestock (KPU: RM-3.1).	K. Accept as written.	K. See paragraphs C & C above.	K. See paragraphs C & C above.
L. (KPU: W/L-3.2, BPU: W/L-3.1) Manage 474,530 acres of mule deer winter & early spring range so there is adequate food, cover & water for 5,390 animals by 1990. Specifically allocate forage, implement management systems which recognize physiological requirements of shrubs, adjust livestock turnout dates on crucial areas, maintain 60/40 forage cover ratios, improve deer nutrition via planting of desirable forage.	L. Same as K above.	L. Accept as written.	L. See paragraphs C & C above.	L. See paragraphs G & C above.
M. (KPU: W/L-3.3, BPU: W/L-3.2, ORA: W/L-1.2). Manage 1,556,140 acres of mule deer spring, summer & fall range so there is adequate food, cover & water for 3,175 animals by 1990. Specifically, allocate forage, implement management systems which recognize physiological requirements of shrubs, adjust livestock turnout dates on crucial areas, maintain 60/40 forage cover ratios, improve deer nutrition via planting of desirable forage & maintain sufficient water in all artificial catchments, pipelines, troughs & springs to meet big game needs from July 15 until Oct. 31 of each year.	M. Same as K above.	M. Accept as written.	M. See paragraphs G & C above.	M. See paragraphs C & C above.

Table 2-13 (cont.)

N. (KPU: W/L-3.4, BPU: W/L-3.3, ORA: W/L-4.1). Manage 1,685,942 acres as pronghorn habitat & provide sufficient forage, water, cover & space for 1,580 animals by 1990. Specifically, allocate sufficient forage by allotment & pasture & consider the "Guidelines for the Management of Pronghorn Antelope", when making management decisions that affect antelope. Specific guidelines state: 1) vegetative manipulation no larger than 1,000 acres, treatment of big sagebrush exceeding 30% & average height 30" may be manipulated to improve vegetative & forb composition.	N. Same as K above. Application of land treatments over 1,000 acres (KPU: RM-1.8, BPU: RM-2.2). Sagebrush treatments exceeding 30% canopy cover (KPU: RM-1.7, BPU: RM-2.1).	N. Accept recommendation as written with exception that "habitat manipulations exceeding 1,000 acres per project permitted. If through the EA process, the district/resource wildlife biologist determines that the project will not adversely impact pronghorns, & the design of the project is compatible with bighorn needs.	N. See paragraphs G & C above.	N. See paragraphs G & C above.
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Objective #6 (Wildlife-terrestrial) - Manage all meadows & riparian habitat to obtain a maximum diversity of vegetative species in order to provide for a maximum diversity and optimum abundance of wildlife species.

Rationale - Riparian and meadow habitats produce the greatest vegetative diversity and abundance of any ecological sites.

Single Use Recommendations (MFP-1)	Other MFP-1 Resource Management Recommendations which Conflict	Multiple Use Recommendation (MFP-2)	Rationale for the M.U. Recommendation	Resource Trade-offs
O. (KPU: W/L-5.4, BPU: W/L-6.1) To enhance wildlife diversity & abundance, all riparian habitats & meadows will be managed to attain & maintain a good ecological condition class. Specifics include designation of mapping unit 7 (canyons) unsuitable for livestock grazing.	O. Same as K above.	O. Modify recommendation: Designate Mapping Unit 7 as unsuitable for livestock grazing except those segments of the unit which currently constitute a major portion of a given pasture within which they are located. If necessary, fence these areas to exclude livestock. Provide fenced water gaps where necessary.	O. See paragraphs G & C above.	O. See paragraphs G & C above.

Objective #1 (KPU) #2 (BPU) (Wildlife-aquatics) - Improve fisheries habitat to fair and good condition by 1989 on 149 stream miles through intensive livestock management. Improve water quality in 18 stream sites to chemical levels that are within tolerance levels of trout.

Rationale - Loss of riparian vegetation adversely affects many of the other habitat factors which provide good overall production and stability in a stream.

Single Use Recommendations (MFP-1)	Other MFP-1 Resource Management Recommendations which Conflict	Multiple Use Recommendation (MFP-2)	Rationale for the M.U. Recommendation	Resource Trade-offs
P. (KPU: W/L-aq-1.2, BPU: W/L-aq-2.2) Improve fisheries habitat condition from poor to fair & fair to good through intensive livestock management on riparian areas of 45.5 miles of stream on public lands. Specific intensive management practices include changes to present grazing systems to rest rotations, deferred grazing or exclusion in riparian areas, & reduction of livestock stocking rates.	P. Same as K above.	P. Accept MFP-1 but, after the period of time of intensive livestock management required to bring habitat factors to an upward trend & to good condition in 3 to 5 years, livestock use may be made as long as the upward trend & good fisheries habitat condition is maintained.	P. Same as G & C above.	P. Same as G & C above.

Objective #2 (Cultural) - Use all available means of physical protection to help preserve significant cultural sites.

Rationale - Under federal regulations, neglect is regarded as an adverse effect on cultural properties eligible for listing on the National Register. Responsible federal agencies must take an active role in preserving and protecting cultural sites from both natural and human sources of deterioration.

Single Use Recommendations (MFP-1)	Other MFP-1 Resource Management Recommendations which Conflict	Multiple Use Recommendation (MFP-2)	Rationale for the M.U. Recommendation	Resource Trade-offs
Q. (BPU: CRM-2.4) Physically exclude livestock from 13 specific cultural sites.	Q. Same as K above.	Q. Exclude livestock from the identified site areas. Exclusions should be as small & unobtrusive as possible, & within wilderness management guidelines for 3 of the areas.	Q. These areas are undergoing moderate impacts by livestock. The areas excluded are not large with the exception of Pole Ck./Camas Ck. The overall amount of forage available is outweighed by overall benefits through protection.	Q. Protection of cultural sites won't occur in these cases without physical developments. Impact on grazing programs would be minimized as implementation of intensive management programs on adjacent areas would absorb lost forage previously available on the 13 sites.

Table 2-13 (cont.)

Objective #1 (Recreation) - Provide high quality recreation opportunity commensurate with present and future demand. Manage public lands to provide varied opportunities for recreation experiences in mostly undisturbed settings.

Rationale - Various laws, policies and plans recognize the Bureau's role in providing a diversity of outdoor recreation opportunities to meet current as well as future demands.

Single Use Recommendations (MFP-1)	Other MFP-1 Resource Management Recommendations which Conflict	Multiple Use Recommendation (MFP-2)	Rationale for the M.U. Recommendation	Resource Trade-offs
R. (BPU: R-1.1[4]) Manage six areas for primitive recreation opportunities.	R. Intensive management call for the development of various facilities throughout the resource area including those areas with primitive recreation values (RM-1.4).	R. Accept recommendation with modification. Those areas identified as semi-primitive motorized, will be managed under IMP until changed by Congress.	R. Bureau policy recognizes the uniqueness of the public lands to provide for primitive & semi-primitive recreation for both the motorized & non-motorized recreating publics. Management of the public lands having these opportunities will recognize & manage for these values.	R. Intensive management techniques projects, etc. will be spread throughout the resource area. IMP permit certain projects which do not adversely alter the possibility for wilderness consideration.

Objective #1 (Visual) - Manage all public lands in a manner which will protect and maintain the existing visual qualities, provide for enhancement where consistent with management policies and provide for the rehabilitation of land which presently do not meet the visual quality standards of surrounding lands.

Rationale - Visual resource values, their recognition, protection and enhancement, are recognized in various federal laws, programs and policies.

Single Use Recommendations (MFP-1)	Other MFP-1 Resource Management Recommendations which Conflict	Multiple Use Recommendation (MFP-2)	Rationale for the M.U. Recommendation	Resource Trade-offs
S. (VRM-1.1 through 1.5) Designate & apply appropriate management practices which recognize the visual values of the public lands in the following VRM classes: VRM Class I - 11% of area VRM Class II - 6% of area VRM Class III - 33% of area VRM Class IV - 33% of area VRM Class V - 18% of area	S. Intensive management practices, particularly use of chaining, burning, road & structures have adverse visual impacts on lands class I & II ratings (RM-1.4).	S. Modify to designate proposed wilderness areas as VRM Class I areas; SRBOP Natural Area will be classified after a special recreation management plan is developed.	S. The Visual Resource Management Program is a process to assist management in recognizing the aesthetics of the public lands & when projects are developed, to reduce visual impact as much as possible.	S. Preserving visual integrity of lands with VRM Class I & II rating will result in redesigning of physical projects & their location to maintain the scenic qualities of these areas.

Objective #1 (Wilderness) - Recommend for wilderness all lands with wilderness characteristics that can be effectively managed to preserve those values.

Rationale - The resource area contains areas and values not currently represented in the national wilderness preservation system, would meet the projected needs for wilderness experiences over the next 40 years and meets all criteria of appropriate federal laws.

Single Use Recommendations (MFP-1)	Other MFP-1 Resource Management Recommendations which Conflict	Multiple Use Recommendation (MFP-2)	Rationale for the M.U. Recommendation	Resource Trade-offs
T. (WN-1.1 through 1.8, ORA: WN-1.1) Recommend to Congress 16 Wilderness Study Areas comprising 447,000 acres as suitable for wilderness.	T. Applying intensive range management practices for brush control & reseeding (BPU: RM-2.2). Development of livestock facilities (BPU: RM-1.4).	T. Accept MFP-1 recommendation but with the following changes: 1) Recommend Owyhee River to be a component of national wild & scenic river system. 2) Adjust boundaries where necessary to improve management capability & to accommodate gas utility corridor. 3) Recommend Pole Creek WSA as unsuitable for wilderness but designate it as an ACEC. 4) Reject recommendation for Bruneau River WSA for wilderness but recommend it for inclusion into national wild & scenic river system.	T. The areas recommended as suitable for wilderness possess high quality values worthy of protection. Areas not recommended for wilderness have values which can adequately be protected through other designations.	T. The application of intensive management programs on lands outside WSAs recommended for wilderness or other designations adequately will meet the needs of other resource groups using the public lands. Approximately 131,500 acres of WSAs is being recommended for multiple use & to receive intensive management for those uses.

Table 2-14
Planning System Objectives/EIS Alternative Action Relationship for Bruneau/Kuna Planning Units and Garat and "45" Allotments
(BPU-Bruneau Planning Unit, KPU-Kuna Planning Unit)

Objective #1 (Range) - Develop range programs and management techniques to: a) increase the vigor, density and production of desirable vegetation on 745,512 acres of public lands within 20 years. b) Increase 532,855 acres in poor to fair condition; 448,698 acres from fair to good condition; maintain condition class of 338,716 acres currently in good and excellent condition and maintain and/or improve 313,233 acres currently in a disturbed, burned or seeding condition within 20 years. Maintain condition class of 3,330 acres currently in good condition. c) Increase total forage production from 210,479 AUMs to 283,244 AUMs within a 20 year period. d) Increase livestock use from 202,275 AUM's to 269,785 AUMs within 20 years (net increase 67,510 AUMs [33%]).

Proposed Action	Continue Present Management (Alternative #1)	No Grazing (Alternative #2)	Increased Livestock Use (Alternative #3)	Reduced Livestock Use (Alternative #4)
a) Objective met.	a) Objective not met. Forage production would continue slow decline	a) Objective met.	a) Objective met.	a) Objective met.
b) Objective not met, only 442,803 acres in poor condition would improve to fair or better condition (83% of objective).	b) Objective not met, condition classes would remain relatively unchanged from present.	b) Objective met.	b) Objective not met, only 443,503 acres in poor condition would improve to fair or better condition (83% of objective).	b) Objective not met, only 461,035 acres in poor condition would improve to fair or better condition (87% of objective).
c) Objective met.	c) Objective not met, forage production would decline to 207,696 AUMs.	c) Objective not met as range improvements & treatments would not be applied. Forage production would be 261,737 AUMs.	c) Objective met.	c) Objective met.
d) Objective met.	d) Objective not met, allocation remains unchanged from present preference/3 year licensed use.	d) Objective not met - no livestock grazing.	d) Objective met.	d) Objective not met, allocation would be 242,949 AUMs.

Objective #2 (Range) - Over the next 15 to 20 years, treat 338,483 acres of suitable public land to increase forage production and reduce the acreage of range in poor condition.

Objective met.	Objective not met, no treatments proposed.	Objective not met, no treatments proposed.	Objective met.	Objective met.
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Objective #3 (Range) - Allocate livestock forage in each of the allotments within limits necessary to maintain and/or enhance the range and soils resource.

Proposed Action	Continue Present Management (Alternative #1)	No Grazing (Alternative #2)	Increased Livestock Use (Alternative #3)	Reduced Livestock Use (Alternative #4)
Objective met.	Objective met.	Objective met.	Objective met.	Objective met.

Objective #1 (Watershed) - Maintain stability of 660,000 acres of moderate, high, and critical erosion hazard classes by reducing or minimizing wind and soil erosion.

Objective met.	Objective not met, soil stability would decrease on areas accessible to livestock.	Objective met.	Objective met.	Objective met.
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Objective #2 (Wildlife-terrestrial) - Manage sensitive species habitat to maintain or increase existing and potential populations.

Objective met.	Objective not met, bighorn sheep habitat would be reduced & animals displaced into Owyhee River system.	Objective met.	Objective not met. Bighorn sheep habitat severely impacted.	Objective met.
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Objective #3 (Wildlife-terrestrial) - Manage 1,685,942 acres of big game habitat to obtain good ecological condition.

Proposed Action	Continue Present Management (Alternative #1)	No Grazing (Alternative #2)	Increased Livestock Use (Alternative #3)	Reduced Livestock Use (Alternative #4)
Objective met for deer and elk.	Objective not met. Competition on range in poor & fair condition & season of use conflicts continue as major problems.	Objective met.	Same as proposed action.	Objective met.
Objective not met for antelope. Antelope winter/early spring ranges would improve slightly but remain in poor range condition.	Objective not met. Habitat conditions & population levels would remain static.	Objective met.	Same as proposed action.	Objective met.

Objective #6 (Wildlife-terrestrial) - Manage all meadows & riparian habitat to obtain a maximum diversity of vegetative species in order to provide for a maximum diversity and optimum abundance of wildlife species.

Objective met.	Objective not met, continued degradation would continue as riparian zones would be accessible to livestock.	Objective met.	Objective met.	Objective met.
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Table 2-14 (cont.)

Objective #1 (KPU) #2 (BPU) (Wildlife-aquatics) - Improve fisheries habitat to fair and good condition by 1989 on 149 stream miles through intensive livestock management. Improve water quality in 18 stream sites to chemical levels that are within tolerance levels of trout.

Proposed Action	Continue Present Management (Alternative #1)	No Grazing (Alternative #2)	Increased Livestock Use (Alternative #3)	Reduced Livestock Use (Alternative #4)
Objective met.	Objective not met, habitat conditions to continue downward as livestock accessibility to streams not controlled. Siltation would increase, cover reduced.	Objective met.	Objective met.	Objective met.

Objective #2 (Cultural) - Use all available means of physical protection to help preserve significant cultural sites.

Objective met.	Objective not met, livestock access to cultural resources would continue & trampling of sites would cause further degradation.	Objective met.	Objective met.	Objective met.
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Objective #1 (Visual) - Manage all public lands in a manner which will protect and maintain the existing visual qualities, provide for enhancement where consistent with management policies and provide for the rehabilitation of land which presently do not meet the visual quality standards of surrounding lands.

Objective met in most cases. Projects will impact values in Class I & II areas.	Objective not met, scenic areas particularly riparian, would continue to decline in visual quality.	Objective met.	Same as proposed action.	Same as proposed action.
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Objective #1 (Recreation) - Provide high quality recreation opportunity commensurate with present and future demand. Manage public lands to provide varied opportunities for recreation experiences in mostly undisturbed settings.

Proposed Action	Continue Present Management (Alternative #1)	No Grazing (Alternative #2)	Increased Livestock Use (Alternative #3)	Reduced Livestock Use (Alternative #4)
Objective met.	Objective generally met, use would increase but quality of experience would be static in some cases & decrease in others.	Objective met.	Objective met.	Objective met.

Objective #1 (Wilderness) - Recommend for wilderness all lands with wilderness characteristics that can be effectively managed to preserve those values.

Objective generally met, impacts would occur to areas meeting wilderness criteria but not recommended as suitable; increased grazing & project development would impact these areas presently in good ecological condition.	Objective met.	Objective met.	Objective generally met but would have major adverse ecological impact on the Big Jacks/Little Jacks WSA.	Same as proposed action.
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COMMENTS AND RESPONSES

All letters and public hearing comments were reviewed and considered in the preparation of the Final EIS. Table 3 lists the letters that were received and the individuals who gave oral testimony at the public hearing.

Although all public input will be considered when management decisions for the Bruneau-Kuna Area are made, only comments that presented new data, questioned the adequacy of the impact analysis or raised questions or issues bearing directly upon the Draft EIS were responded to in this Final EIS. The Text Change section indicates how the Draft EIS was changed, where necessary, to respond to these comments.

Response to Letters

All individuals or groups that submitted comment letters on the Draft EIS are listed in Table 3. However, only the numbered letters in Table 3 are reproduced in the Final EIS. Each substantive comment has also been numbered. The BLM response follows each letter and is numbered to correspond with the appropriate comment found in the letter. The letters not numbered in Table 1 (see list following letter no. 3 and letter no. 36) raise the same issues as the numbered letter immediately preceding them and therefore are not reprinted. See notes in Table 3 for further explanation.

Response to Public Hearing Testimony

All individuals who testified are listed in Table 3. Those individuals who presented testimony that we responded to have also been numbered. Because of the length of testimony, only that portion of the testimony responded to is printed. Each comment is numbered with the response to the comment immediately following it. Some individuals submitted letters and also testified at the public hearings. Where this was the case and where their comments were the same, we have responded to the comments in the letter. If their comments contained different points, we have responded to both the letter and the public hearing testimony.

Table 3

Comments on Draft EIS

Comment Letters

<u>No.</u>	<u>Person(s)</u>	<u>Representing</u>
1	Lee W. Stokes	Idaho Dept. of Health & Welfare
2	Charlotte Evans	Self
3	H.S. Hilbert	Idaho State Univ. Outdoor Program

Note: The issues identified in letters No. 2 and No. 3 above are representative of the issues raised in the 51 letters submitted by the following individuals. While these letters have not been reprinted in the Final EIS, the pertinent issues have been considered and addressed in the responses made to letters No. 2 and No. 3. The statement located in the upper right hand corner of page 46 summarizes the contents of these letters.

Craig J. Gehrke	Self
Martin J. Gabica	Self
Robert N. Jones	Self
H.S. Hilbert (2 letters)	Idaho State Univ. Outdoor Program
Mr. & Mrs. Steven G. Hall (3 letters)	Selves
Bruce M. Hayse	Self
James Johnston	Self
Nancy Richards	Self
Fred W. Rabe	Self
James P. Little	Self
Jerry Jayne	Self
B. Arline Rutledge (3 letters)	Self
Scott Ploger	Self
Tom Mayson	Self
J. L. Wyatt	Self
John Swanson	Self
Mary Knapp	Self
David H. Stewart	Self
Jeffrey Cook	Self
Margaret J. Pratt	Self
Stephen G. Parise	Self
Ed Wardwell	Self
Robert M. Tyler, Jr.	Self
Norma & Herbert Pember	Selves
Jan Boles	Self
Chet Hawker	Self
Deanna Smith	Self
Susie Stafford	Self
Michael W. Baldwin	Self
Tommy Vanderberg	Self
Joe Ultican	Self
Gretchen Coaley	Self

Table 3 (cont.)

Comments on Draft EIS

Comment Letters

<u>No.</u>	<u>Person(s)</u>	<u>Representing</u>
	Dennis Reese	Self
	Christie Calvert	Self
	Susanne Vader	Self
	Dorian Duffin	Self
	Ernie Day	Self
	Dennis Baird	Self
	Larry C. Ashcraft	Self
	Dorothy Christensen & Linda Milam	League of Women Voters of Idaho
	Tom & Ellen Glaccum	Selves
	Pauline Plaza	National Audubon Society
	Michael Beaty	Self
	Steve Jakubowics	Self
	Robert Minter	Self
	Bob Krumm	Self
4	R.T. Nahas	Self
5	John Sparbel & Pamela Wilcox	Nevada State Clearinghouse-Nevada Div. of Conservation Districts
6	L.A. Mehrhoff	Area Office - Idaho & Nevada Fish & Wildlife Service, USDI
7	Neil Rimbey	Extension Range Economist, Univ. of Idaho
8	Bill Tindall	Self
9	Bill Laurance	BSU Conservation Group
10	Amos I. Garrison	Soil Conservation Service, USDA
11	Alan R. Hausrath	Idaho Environmental Council
12	J. Less Guthrie	Big Springs Ranch
13	Richard K. Griswold	Forest Service, USDA
14	James F. Devine	Geological Survey, USDI
15	Donald L. Davis	Owyhee County Commissioners
	Ernie Bahem	
	James Purdom	
16	Bruce Bowler	Self
17	Peter A. Bowler	Self
18	Daniel A. Poole	Wildlife Management Institute
19	Richard L. Winters	National Park Service, USDI
20	Enid I. Hooban	Self
21	William R. Meiners	Idaho Wildlife Federation
	Johanna H. Wald	
22	L.A. Mehrhoff	Area Office Idaho & Nevada Fish & Wildlife Service, USDI
23	Vern Emerry	Ada County Commissioners
	Bill Gratton	
	Marie Schreiner	
24	Jerry M. Conley	Idaho Dept. of Fish & Game
25	Gene Tindall	Owyhee Cattlemen's Association

Table 3 (cont.)

Comments on Draft EIS

Comment Letters

<u>No.</u>	<u>Person(s)</u>	<u>Representing</u>
26	Don A. Olowinski	Natural Resources Division - Office of the Idaho Attorney General
27	Russell W. Heughins	District 3, Idaho Wildlife Federation
28	Theodore S. Weigold	Self
29	B.J. Graves	Humboldt National Forest
30	Marjorie G. Hayes	Self
31	William S. Hayes	Self
32	Charles C. Yoder	Sierra Club - Middle Snake Group
33	Helen Langworthy	Self
34	J. Casey Meredith	Self
35	Tim Kesinger & Valerie Ryan	Selves
36	Tim Evans	Self

Note: Letter No. 36 is representative of the same issues identified by the following 3 individuals. Only letter No. 36 has been represented but the responses by BLM apply to all four letters.

	Rick Johnson	Self
	Lisa K. Miller	Self
	John Fankhouser	Self
37	Bruce R. Bocard	Committee for Idaho's High Desert
38	Dan Grzenia	Committee for Idaho's High Desert
39	Randall E. Morris	Self
40	John R. Spencer	U.S. Environmental Protection Agency
41	Thomas J. Green	Idaho State Historical Society
42	Tom Olson	Idaho Cattle Feeders Association, Inc.

Hearing Speakers

Grand View, Idaho - June 29, 1982

43	Frank Bachman	Battle Creek & Northwest Allotment Permittees
44	Randall Morris	Self
45	Daryl Keck	Glenns Ferry Grazing Assoc.
46	Bob Collett	Castle Creek Allotment
47	Gene Davis	Self; Bruneau Cattle Co.
48	Don Davis	Self; Owyhee County Commissioners
49	Guy Coyler	Coyler Cattle Co.
50	Rayola Jacobson	Idaho Farm Bureau

Table 3 (cont.)

Comments on Draft EIS

Boise, Idaho - July 1, 1982Hearing Speakers

<u>No.</u>	<u>Person(s)</u>	<u>Representing</u>
51	Alan Hausrath	Idaho Environmental Council
52	Ray Blair	Glenns Ferry Grazing Assoc.
53	Gene Davis	Self; Bruneau Cattle Co.
54	Russel Heughins	District 3, Idaho Wildlife Federation
55	Eric Davis	Owyhee Cattlemen's Assoc.
56	Bill Laurance	BSU Conservation Group
57	David Lahtinen	Self
58	Chet Sellman	Self
59	Tom Blessinger	Self
60	Rayloa Jacobson	Idaho Farm Bureau

Testimony was also received from the people listed below. Response to their comments have either been made from their letters submitted and listed above or not made as their issues or comments were addressed by previous individuals and responded to. However, all comments received at the public hearings are on record and have been considered in preparation of the Final EIS.

Grand View, Idaho Hearing, June 29, 1982

<u>Person</u>	<u>Representing</u>
Frank Davis	Self
Lloyd Knight	Self

Boise, Idaho Hearing, July 1, 1982

Bob Collett	Idaho Cattlemen's Assoc.
Bruce Bocard	Committee for Idaho's High Desert
Bill Meiners	Natural Resources Defense Council & the Idaho Wildlife Federation
Ted Weigold	Self
Tom Olson (see Letter No. 40)	Idaho Cattle Feeders Assoc.
Chris Yoder	Sierra Club - Middle Snake Group
Frank Bachman	Battle Creek & Northwest Allotment Permittees
Don Davis	Self; Owyhee County Commissioners
Guy Coyer	Colyer Cattle Co.
Zane Block	Self



STATE OF IDAHO

DEPARTMENT OF HEALTH
AND WELFARE

DIVISION OF ENVIRONMENT
Statehouse
Boise, Idaho 83720

May 25, 1982

Martin J. Zimmer, District Manager
Bureau of Land Management
Bruneau-Kuna Grazing EIS
Boise District Office
3948 Development Avenue
Boise, ID 83705

Dear Mr. Zimmer:

The Idaho Department of Health and Welfare - Division of Environment has received the Bruneau-Kuna Grazing draft EIS and wishes to submit the following comments.

- 1) It is our understanding that water quality and fisheries habitat will improve under the proposed action as described on pages 4-9 through 4-15.
- 2) Intensive livestock management and livestock exclusion measures should decrease sediment production and improve the temperature regime for trout.

The Division, therefore, concurs with the selected alternative. Thank you for the opportunity to comment on this draft EIS.

Sincerely,

Lee W. Stokes
Lee W. Stokes, Ph.D.
Administrator

LWS/kks

cc: Lisa Corbyn - EPA, Region X
EPA - Idaho Operations Office

EQUAL OPPORTUNITY EMPLOYER

Mr. Martin Zimmer,
District Manager
Boise District BLM
3948 Development Avenue
Boise, Idaho 83705

Dear Mr. Zimmer:

I would like to make the following comments on the Draft Bruneau Kuna Grazing EIS.

1. I am strongly opposed to the construction of any pipeline on the Big Jacks-Little Jacks Creek plateau. The pipeline will have an adverse impact on bighorn sheep; it will destroy some of the last remnants of desert grasslands in good ecological condition; and it will have an adverse impact on mule deer and other wildlife.

- 2.1 The final EIS should include, at a minimum, the following: a detailed cost-benefit analysis of the pipeline; a detailed cost-benefit analysis of several alternatives to the pipeline, such as range improvements on Wickney Tree dome; a detailed analysis of the impacts of the pipeline on mule deer, antelope, sage grouse, bobcat, mountain quail, and any other sensitive wildlife species; an assessment of the impacts of the pipeline on the Idaho Fish and Game proposal to reintroduce bighorn into Big Jacks Creek; an assessment of the pipeline impacts on the ecology of the grassland; and a detailed description of how the decision to build the pipeline was made, especially in light of the overwhelming public opposition to the project. I urge you to do a complete, separate EIS on the pipeline before granting any approval to the project.

- 2.2 I think the BLM allocation of 1% of the competitive forage to wildlife is far too low, and not in line with the BLM's legal mandate of multiple use management of the public lands. This allocation is lower than the 2.5% mentioned in the Owyhee Wilderness EIS for that area; the Bruneau should allocate at least this much forage to wildlife. More unallocated forage should be included in the preferred alternative-we should not be forced to give up all the of the last good-quality grasslands to a single use. The final EIS should include more documentation of the effects of the Proposed Action on mule deer, antelope, sage grouse, and other wildlife species, as well as on the ecological condition of the lightly used, good-quality areas proposed for grazing. Because of the beneficial impacts on wildlife (while still allowing almost as many cattle as the Proposed Action) I urge BLM to adopt alternative 4, the Reduced Livestock Use alternative.

- 2.3 I support the BLM Wilderness recommendations for the Owyhee River and the other areas, but would like to see BLM include more of the Bruneau Plateau, Big and Little Jacks Creeks, and other portions of the WSAs.

Thank you for this opportunity to comment.

Sincerely,

Charlotte Evans
Charlotte Evans

The Bureau received 53 letters containing similar comments on the draft EIS. All of these letters have not been reproduced in the final EIS because of the similarity of their contents. Forty-seven of the letters expressed opposition to the construction of a water pipeline on the Big Jacks - Little Jacks Creek plateau; 31 said they favored selection of alternative 4; 28 objected to the proposed action's forage allocation, saying too little was allocated to wildlife; 24 suggested that we complete the range improvement projects on Wickney Tree Dome in place of the pipeline into the Big Jacks - Little Jacks Creek plateau; 27 stated that a benefit/cost analysis should be completed on the pipeline; 25 said that a separate EIS should be done on the pipeline and 30 addressed the wilderness suitability recommendations for the Bruneau Resource Area. The following two letters (No. 2 and 3) are a representative sample of these points.

Response to Letter No. 2

- 2.1 A benefit/cost analysis for the Jacks Creek pipeline will be completed when allotment management plans are prepared for the Battle Creek and Northwest Allotments. The analysis will be done on an allotment basis and will consider all improvements planned for these allotments and their benefits and costs. The analysis will be done at this level because the pipeline and other projects will affect the type and design of grazing systems and grazing management that will be implemented over the entire allotment.

- 2.2 A detailed analysis of the Jacks Creek pipeline has been completed for this EIS. Where impacts of the pipeline were judged to be significant, they have been documented throughout the individual resource sections in the environmental consequences chapters. In places, the impacts of the Jacks Creek pipeline are included in the documentation of impacts from either "water development" in general or from "pipelines" in general. Where the impacts of the Jacks Creek pipeline were different than those documented for these broader classifications the impacts were documented specifically as affected by the Jacks Creek pipeline. Because the analysis is spread throughout the document the following consolidation of impacts for the 19 mile pipeline is provided.

Vegetation - Development of the pipeline would aid in reducing the livestock pressures on unfenced riparian areas.

Structural developments would improve livestock distribution and utilization patterns.

The pipeline would be made available for livestock grazing 2,332 AUMs of forage which is currently being produced but is unusable by livestock because of lack of water.

Wildlife - Introduction of the pipeline would have little effect on wildlife populations, other than those mentioned for bighorn in the Draft EIS. This assessment of the impact of the pipeline on wildlife is based on the range prediction that the present range condition class would not decline. It is recognized though that localized areas around water troughs would be trampled and heavily utilized by livestock.

- Bighorn Sheep: Approximately two to three square miles of bighorn habitat east of Rattlesnake Creek would be available for livestock use. Five to 10 bighorn sheep may be displaced by this use. The pipeline would not affect potential bighorn sheep habitat on Big Jacks Creek.

- Sage Grouse: The pipeline would provide additional sources of water and improve grouse distribution.

3

STUDENT UNION
IDAHO STATE UNIVERSITY
Pocatello, Idaho

B3209

June 30, 1982

Visual Resources - Portions of the pipeline would fall within VRM Class II, III and IV areas. Visual impacts would normally exceed the desired contrast rating on Class II and III areas. (Special mitigation measures would need to be applied.) The Jacks Creek pipeline may displace a portion of the bighorn sheep herd which is a valuable scenic asset to the area.

Wilderness - Areas within two miles of the pipeline would be subject to increased livestock use. The condition or areas immediately adjacent to water sources would decline.

Physical construction and maintenance of the pipeline would not significantly impact apparent naturalness, opportunities for solitude, or primitive recreation within the adjacent WSAs. Increased livestock grazing, however, would have significant impacts on the ecological values of 7,200 acres within Big Jacks and Little Jacks proposed wilderness areas. These areas are in good range condition and lie within two miles of the proposed pipeline. They are presently lightly grazed and would be subject to increased grazing pressure following completion of the pipeline. Specific impacts would be similar to those listed under vegetation allocation (page 4-15) with severity of impacts dependent on distances from the pipeline.

Standard Bureau environmental assessment procedures would be followed prior to development. If significant impacts are identified that are not addressed in this document a separate EIS would be prepared.

- 2.3 The forage allocation to wildlife is sufficient to satisfy the 1990 Idaho Fish and Game population goals. As additional vegetation becomes available, wildlife forage allocations would be increased. A 20-30% increase is expected by the end of the 20 year period. The revised description of the proposed action expands the discussion of the forage allocation procedures.
- 2.4 The documentation of impacts in the draft EIS was evaluated to determine if there were any additional impacts that were not documented. The description of impacts on unfenced riparian areas (see text change section) has been expanded. We did not identify any other impacts that were not documented.
- 2.5 The wilderness suitability recommendations for WSAs are included in this EIS because of the constraints that would be placed on the livestock grazing program if they were designated as wilderness. The wilderness suitability recommendations and various alternatives will be fully addressed in the Wilderness EIS which is scheduled to begin in October, 1982. All areas will be managed under the Wilderness Interim Management Policy until released from the wilderness review process.

Area Code 208

Director

236 2427

Asst. Director

236 3757

Program and

Recreation Director

236 3451

ations and

Caring

236 4257

Games Area

236 3335

Maintenance Supervisor

236 3781

Guidance Program

235 3912

Craft Shop

235 3281

Wilderness Rental Center

236 2945

Information Center

236 2296

Mr. Martin J. Zimmer, Dist. Mgr.
 Boise, BLM
 3948 Development Avenue
 Boise, ID 83705

Dear Mr. Zimmer:

I am writing to express my opposition to any pipeline construction on the Big Jacks-Little Jacks Plateau. I urge the BLM to return to its original proposal for range improvements on Wickney Tree Dome to supply the cattle forage the pipeline would provide. Also, I want the BLM to do a detailed economic analysis of the project, including a benefit-cost analysis. Included in this analysis must be the economic value of bighorn sheep (as a trophy species), both for the animals which would be eliminated and the value of the bighorn potential forgone in the Big Jacks Creek area. Finally, your agency must do an environmental impact statement before the BLM grants approval of such a project. Is it true that this pipeline proposal will be for the benefit of two ranchers? Smells like a porkbarrel to me.

Please notify me of any action affecting this region.
 Thank you.

Sincerely,

H. S. Hilbert
 H. S. Hilbert, Director
 ISU Outdoor Program

Response to Letter No. 3

- 3.1 The Bureau never proposed to develop livestock forage on Wickney Tree Dome to supply forage the pipeline would provide. This area has been identified as being potentially suitable for brush control projects. However, because the majority of this area is comprised of a low sagebrush range site with relatively low site productivity, treatment of this area would not provide as much forage as the Jacks Creek plateau area.
- 3.2 See Response No. 2.1.
- 3.3 See Response No. 2.2.
- 3.4 Development of the pipeline would benefit two allotments, Northwest and Battle Creek, not two operators. There are five operators in the Northwest Allotment and seven operators in the Battle Creek Allotment.

R.T. NAHAS COMPANY *Since 1947*
 REAL ESTATE DEVELOPERS AND INVESTORS

20630 PATIO DRIVE
 CASTRO VALLEY, CALIFORNIA 94546
 TELEPHONE (415) 538-9600

June 10, 1982

Mr. Martin J. Zimmer
 District Manager
 Bureau of Land Management
 3948 Development Avenue
 Boise, Idaho 83705

Dear Martin:

I am not satisfied with the EIS statement for the Bruneau-Kuna grazing area. I think that the land classifications are too arbitrary and were the result of a survey made by individuals who were not familiar with the local soil and climatic conditions. If a survey were to be made now, the results would be quite different because of the excellent rainfall that we experienced last year. I am very anxious to participate in a coordinated effort to improve the range lands, but I have very little confidence in the environmental impact statement as presented.

Cordially,

R.T. Nahas
 R. T. Nahas

RTN:rb

cc: Tom Blessinger



STATE OF NEVADA
GOVERNOR'S OFFICE OF PLANNING COORDINATION
CAPITOL COMPLEX
CARSON CITY, NEVADA 89710
(702) 885-4865

- 4.1 The vegetation inventory conducted in 1979, 1980, and 1981 followed established BLM inventory procedures. The vegetation sampling was done in conjunction with a soils inventory of the area. Where possible, the vegetative production estimates were adjusted to represent the amount of forage that would be present on a year with normal temperatures and precipitation levels. The management based on this data will be adjusted as found appropriate through the monitoring program that would be implemented.

June 15, 1982

Mr. Martin J. Zimmer
District Manager
Bureau of Land Management
Bruneau-Kuna Grazing EIS
3948 Development Avenue
Boise, Idaho 83705

RE: SAI NV# 82300058 Project: Draft - Bruneau-Kuna Grazing EIS

Dear Mr. Zimmer:

Attached is the comment from the following affected State Agency: Conservation District concerning the above referenced project.

This comment constitutes the State Clearinghouse review of this proposal. Please address this comment or concern in the final decision.

Sincerely,

John Wm. Spärbel
John Wm. Spärbel
State Planning Coordinator

JWS/sl
Enclosure

NEVADA STATE CLEARINGHOUSE REVIEW FORM

- TO: *Val* (Circulate where appropriate)
- ☐ Transportation
☒ Conservation & Natural Resources
☐ Human Resources
☒ Wildlife
☐ Budget
☐ Historic Preservation & Archeology
☒ Agriculture
☐ Community Services Agency
☐ Commerce
☐ Public Service Commission

PLANNING COORDINATOR
GOVERNOR'S OFFICE
CAPITOL COMPLEX
CARSON CITY, NEVADA
885-4865

5-27-82
Date

FROM: *John Spärbel* State Planning Coordinator

SAI NV # *82300058* PROJECT: *Draft - Bruneau-Kuna Grazing EIS*

Response to Letter No. 5

- 5.1 Coordinated resource management planning will be implemented as outlined in the current Memorandum of Understanding between the State of Idaho, U.S. Department of Agriculture and the U.S. Department of Interior.

Attached for review and comment is a copy of the aforementioned project. PLEASE evaluate it with respect to

- 1) the program's effect on your plans and programs
- 2) the importance of its contribution to State and/or Areawide goals and objectives
- 3) its accord with any applicable law, order or regulation with which you are familiar
- 4) additional considerations.

PLEASE submit your comments to this office NO LATER THAN *6-14-82* by checking the appropriate box below and returning the form to this office. *Please do so even if you have no comment* on this particular project so that we may complete our processing.

THIS SECTION TO BE COMPLETED BY REVIEWING AGENCY (Conservation Districts)

- ☐ No comment on this project
☐ Proposal supported as written (see below)
☐ Additional information (see below)
- ☐ Conference desired (see below)
☐ Conditional support (outlined below)
☐ Disapproval/denial of funding (must specify reason below)

Comments (use additional sheets if necessary)

The Nevada Division of Conservation Districts appreciates the opportunity to review this Grazing EIS. While it includes only a very small portion of Nevada, it will impact the state substantially since Nevada livestock operators do run cattle in this area of Idaho.

We are not familiar enough with conditions in this area to comment on the specific action proposed or on its impacts. However, the methodology and the general direction of the preferred alternative are acceptable to this office. We would agree that the proposed action would be the best alternative.

This office is pleased to see here a commitment to implementation through a monitoring program (p. 2-14, 15). We hope, however, that the BLM will be prepared to show some flexibility on the implementation time schedule. With the low precipitation in this area, and the great variability of precipitation amounts from year to year, there may be no visible response to range improvement programs within five years, especially if those five years are unusually dry.

The Grazing EIS's recently released in Nevada include a commitment to implementation through Coordinated Resource Management and Planning. Since Idaho also has a state CRMP memorandum of understanding and has done CRM planning, it would be desirable for this EIS to contain a similar commitment. For example, the following quotation is from the Sonoma-Gerlach Grazing EIS: "Many of these issues will be resolved at the MFP III stage and/or during the implementation stage at which time all interested groups and individuals will be offered the opportunity to join with the Bureau in resolving these and other issues through Coordinated Resource Management and Planning." (P. iii)

Administrative Officer

885-5414

June 14, 1982

Pamela B. Wilcox
Pamela B. Wilcox



United States Department of the Interior

FISH AND WILDLIFE SERVICE

AREA OFFICE - IDAHO AND NEVADA
4620 OVERLAND ROAD, ROOM 238
BOISE, IDAHO 83705
FIS- 554-1960 / COMM. 206/334-1960

6

If you have any questions please contact our botanist Bob Parenti (208) 334-1816.

Thank you for the opportunity to review your EIS.

L. R. Mehrhoff
L. R. Mehrhoff

DATE: June 18, 1982
TO: District Manager, BLM, Boise, ID
FROM: Area Manager, FWS, Idaho/Nevada Area, Boise, ID
SUBJECT: Oraft Bruneau-Kuna Grazing Environmental Impact Statement (EIS)

cc: RO, Portland, OR (AFA-SE)
IOFG, Headquarters
IOFG, Region 4
FWS/OES, Washington, D.C. (EC 82/11)

6.1 We have reviewed the subject EIS. Our only comments at this time are on the threatened or endangered plant species discussed in your EIS.

The following plants are included in the December 15, 1980, Federal Register:

Idaho

Astragalus camptopus
Astragalus mulfordiae
Astragalus yoder - williamsii
Erigeron latus
Lepidium davisii

Oregon & Nevada

Hacklia ophiobia

The following plants are not in the Federal Register:
Astragalus atratus var. owyheensis, Eriogonum ochrocephalum var. nov.

The above two plants have been recommended by the Idaho Plant Committee to be placed on the Federal watch list.

The following plants were considered for Federal listing but rejected:

Pteris thompsonae
Primula cusickii (I believe this should be cusickiana).

Species on Idaho's State watch list:

Lupinus uncialis

Plants considered for Idaho State listing but rejected:

Astragalus iodonthus var. vipereous

2

Response to Letter No. 6

6.1 The text has been changed to reflect your information. See text change section.

COOPERATIVE EXTENSION SERVICE



University of Idaho
College of Agriculture
In Cooperation with the
U.S. Department of Agriculture
SW Idaho R/E Center
Route 8, Box 8478
Caldwell, ID 83605
(208) 459-6365
July 2, 1982

Mr. Martin J. Zimmer
Bureau of Land Management
Bruneau-Kuna Grazing EIS
Boise District Office
3948 Development Way
Boise, ID 83705

Dear Mr. Zimmer:

Thank you for the opportunity to comment on the Bruneau-Kuna Grazing Environmental Impact Statement Draft. I would like to commend you and your staff for your efforts in producing this document. It appears to be very complete and readable.

7.1 I would like to offer several comments concerning the economic analysis in the document and several inconsistencies that I discovered. First, the economic analysis is very complete and thorough. The budgets which appear in Appendix Tables D-1 through D-3 are fairly close to the current situation as far as market prices and costs. The one figure in the budgets which appears low is the "Interest on Operating Capital." For example, using Table D-3, the cash costs (excluding interest on operating capital) would total \$251,483. Short-term interest from most lending institutions is currently in the area of 15-18%. The interest expense on the operating loan would total \$38,980, assuming interest of 15%.

7.2 One other area of concern involves the proposed action and the reduced livestock grazing alternative. Under the proposed action, total employment (direct and indirect) would increase by 132 jobs by year 20. In comparison, the reduced livestock use alternative (#4) would show an increase of 147 jobs after 20 years. How is this possible? Your trade area of Owyhee and Elmore counties is largely dependent upon agriculture as a basic industry. I would hypothesize that in a basic economy such as this one that the impact of livestock grazing reductions would definitely affect regional employment much more negatively than you have shown in Table 4-27. Even in year 5, what will the 30 additional construction jobs and 10 additional service jobs be doing?

7.3 In regards to the Jacks Creek Pipeline, I question whether the construction of the lines in segments would be economically feasible. The proposed action calls for construction of 19 miles, while alternative #3 shows the possibility of constructing an additional 22 miles of lateral lines. If the pipeline is to be constructed, I would urge you to construct the complete 41 miles in one phase. This would aid in reducing the total cost of the system. For example, construction in two phases would involve double expenses of moving

7.3 equipment, work crews, and materials into a remote area. If this is done in one phase, the marginal cost of the additional 22 miles of laterals would be the operating costs. I am sure that the livestock permittees would also assist in the construction of the line -- by supplying labor, materials and/or equipment, thus reducing the BLM cost even more. These types of considerations become critical when dealing with economic efficiency.

7.4 On page 4-9, the document raises several points relating to riparian areas. Mention is made of "153 public stream miles" that would be improved through "fencing, juniper structures, etc." I question the economic feasibility of spending \$2,000-2,500 per mile of fence for non-quantifiable benefits. It also raises additional questions concerning your source of funding (who pays for this?) and the annual maintenance expenses involved with "153 miles of fences and juniper structures." I urge you to seek other methods of management (grazing systems, etc.) which would prove more cost effective and not alienate the livestock producers.

7.5 On pages 3-8 and 3-9, I detect some inconsistency concerning livestock/bighorn sheep interactions. On page 3-8 mention is made of "poor habitat separation between cattle and bighorns on Battle Creek," a "downward trend in bighorn numbers," and bighorns moving into the Owyhee River system to "avoid interaction with livestock." On page 3-9, it is stated that "bighorn use is largely confined to the canyons and adjacent plateaus..." while cattle use is "limited to the plateau areas." From this statement, it would appear that there is some "habitat separation." How can there be a "downward trend in bighorn numbers" when 38 bighorns released between 1963 and 1966 in the Owyhee River canyon have grown to about 220 animals, and the 12 bighorns transplanted on Rattlesnake Creek now number about 100 head? Finally, livestock permittees in the area have indicated that bighorns do not "move to avoid interaction with livestock," but rather to seek interaction with livestock. I would urge you to clear up these apparent inconsistencies.

Again, I thank you for the opportunity to comment. I look forward to continued work and cooperation with you and your staff.

Sincerely,

Neil Rimbey
Neil Rimbey
Extension Range Economist

bds

7.4 It is anticipated that only 107 of the 153 stream miles identified for fisheries habitat improvement would be excluded from grazing. Because these 107 miles are located in narrow deep canyons, it is felt that grazing systems alone would not provide satisfactory improvement. Because fencing would occur along the canyon rims where natural barriers could be used, the total amount of fence required would be approximately 50 miles. As shown on Table 2-4, construction and maintenance costs would be born by the BLM.

7.5 Along Battle Creek, cattle are using bighorn habitat intensively. This intensive use is considered to have caused a decline in use of this area by bighorns. No other problems with the bighorn population or habitat separation in remaining parts of the habitat along the Owyhee River and Deep Creek are known.

7.6 Maintenance of a separation between use areas for bighorn sheep and cattle is considered necessary for conserving populations of bighorns. This management direction is based upon research (Russo 1956, Wilson 1968, Irvine 1969, Dean And Spillet 1976) which documents that cattle significantly affect bighorn distribution. Individual bighorns or groups of bighorns may deviate from this general behavioral response. Nevertheless, management must be based on the needs of the entire population.

- 7.1 The ranch budgets used in this analysis were prepared by C. Kerry Gee of the Economic Research Service, U.S. Department of Agriculture. The interest calculations assumed operating capital is borrowed for six months and the interest rate is the average annual rate of the Production Credit Association.
- 7.2 In this EIS, it was assumed that increased income in the EIS area would translate into increased employment. Data from the Idaho Department of Employment was used to determine the wages per job. In 1980, the wages per job were found to be \$10,858 in Agriculture, \$14,121 in Construction, and \$7,388 in Services for the EIS area. The following table shows how this affects the 20-year employment projections found in the DEIS:

Income and Employment - 20 Year Projections

Alter.	Sector	Direct Income	Total Income	Total Jobs
Proposed Action	Agric.	\$ 683,700	\$ 929,800	88
	Construct.	41,000	46,100	3
	Services	266,100	300,700	41
TOTAL		\$ 990,800	\$1,276,600	132
Alt. 4	Agric.	\$ 476,800	\$ 648,500	60
	Construct.	40,800	45,900	3
	Services	550,100	621,600	84
TOTAL		\$1,067,700	\$1,316,000	147
Difference PA minus Alt. 4	Agric.	- 206,900	- 281,300	- 28
	Construct.	- 200	- 200	0
	Services	+ 284,000	+ 320,900	+ 43
TOTAL		\$+ 76,900	\$+ 39,400	+ 15

As can be seen from the table, the livestock industry is impacted considerably by Alternative 4 but the gains in recreation-related services more than make up for that loss on a regional basis. In year 5, the 30 additional jobs in construction for the installation of range improvements is two jobs less than the proposed action (+32). The 10 additional jobs for recreation-related services is 1 job more than the proposed action (+9).

- 7.3 Construction of the Jacks Creek Pipeline would not be constructed in two separate phases. If the proposed action is selected as the final decision, only 19 miles of the pipeline would be built. If the decision is made to construct the entire pipeline (Alternative 3), it would most likely occur in one phase. A detailed benefit cost analysis of either proposal will be made in conjunction with the implementation of allotment management plans on affected allotments.

*Thomas R.
Brunman, Sr.
July 5, 1982*

*Bureau of Land Management
Boise, Idaho
Dear Sirs,*

I would like to give a few observations I have on the Brunman-Kuma Grazing E.I.S. Draft.

It seems to me that many of the people who are trying to form the policies are forgetting that the abundance of comparably cheap food is one of the principle things responsible for the greatness of our country. If a large percent of the work force had to spend a large part of their time providing food, less time would be available to create the other necessities and finer things of life. Also less time would be available for wilderness and other less necessary things in life. With increasing populations and foreign markets opening I think the multiple-use management concept should be used with the present and potential food production always in mind. Multiple use of the land with each user paying its proportional share of administration and maintenance expenses would keep the different uses more in line with their values to the people.

This Brunman-Kuma district is not producing a very high percent of the total food supply, but I want to point out the potential, and the fact that a relatively small percent of the food supply creates surpluses, or shortages, so lets not eliminate anymore

of the potentials for production than is necessary.

This entire study has been very expensive but probably justified because of the necessity to establish management with priorities and resolve between established uses and new demands for uses of the land. Mostly I agree with the EIS. Mostly I disagree with the wilderness designations. All of this could have been managed by the BLM, under multiple use. Especially, I believe it was a mistake to designate both the Sheep Cr West and the area between Little and Big Jacks Cr as a wilderness study areas. This creates extra expenses, delays, and restricts development of potentials that would be beneficial to the immediate areas as well as relieving pressures in adjacent areas. In both cases wildlife and livestock would benefit and the general area would be enhanced, enjoyed and used by more people under multiple use.

This is what the BLM is all about - to manage, develop and provide the best benefits for the most people. I think this can be accomplished without large amounts of money from the treasury. And it can be done mostly under the multiple-use concept.

Sincerely yours
Bill Sundall

Mr. Martin J. Zimmer
District Manager
Boise District BLM
3948 Development Avenue
Boise, Idaho 83705

Dear Sir:

The Boise State University Conservation Group would like to go on record as proponents of Alternative 4 after reviewing the Draft Bruneau/Kuna Grazing Environmental Impact Statement. Reasons for this recommendation include:

- 1) Alternative 4 will enhance the preservation of extensive areas of native bunchgrass communities near Big and Little Jacks Creek. These native grasslands have become increasingly rare in the last 100 years and their demise is apparently associated with overgrazed range conditions.
- 2) Sage Grouse, Antelope and Mule Deer populations would benefit from the increase in unallocated foraging areas under Alternative 4.
- 3) Alternative 4 would ultimately improve range condition by short-term AUM decreases which would facilitate the recovery of range condition and the reestablishment of native perennial grass species. Many native grasses, such as Bluebunch Wheatgrass, are more palatable to both wildlife and cattle.
- 4) Evidence is recently accumulating which indicates many small mammal communities are deleteriously affected by overgrazing of rangeland by cattle. Some small mammals may be obligatorily associated with native grassland communities. Overgrazing and planting of crested wheatgrass has also been shown to have a negative impact on rangeland nesting bird species.

References cited at the Boise public hearing:

Beauchamp, A.C. and McClenaghan, L.R. RELATIONSHIPS OF RODENT SPECIES DIVERSITY TO HABITAT COMPLEXITY IN DESERT TRANSITION COMMUNITIES FROM SOUTHERN CALIFORNIA. 1982. Dept. of Biology, San Diego State University

Reynolds, T.R. THE RESPONSE OF NATIVE VERTEBRATE POPULATIONS TO DIFFERENT LAND MANAGEMENT PRACTICES ON THE IDAHO NATIONAL ENGINEERING LABORATORY SITE. 1978.

-EFFECTS OF SOME DIFFERENT LAND MANAGEMENT PRACTICES ON SMALL MAMMAL POPULATIONS. 1980. Journal of Mammalogy 6(3): 558-561.

Laurance, W.F. (unpub). VEGETATIONAL DIFFERENCES AND ASSOCIATED DISSIMILARITIES BETWEEN TWO SMALL MAMMAL COMMUNITIES ON LIGHTLY AND HEAVILY GRAZED RANGELAND IN SOUTHERN IDAHO. Dept. of Biology, Boise State University

We thank you for your time and for the opportunity to comment on this

Draft EIS.

Sincerely,
Bill Laurance
Bill Laurance, director

Response to Letter No. 9

- 9.1 We recognize that overgrazing by livestock can adversely affect small mammal abundance and diversity on rangelands. Small mammals, though, should benefit from "predicted" vegetation improvement on native rangeland, as described in the proposed action (Appendix Table B-5 and B-7). Positive changes in range condition should lead to improved small mammal populations.

Crested wheatgrass seedings would result in localized population declines and decreases in species abundance and diversity of small mammals, reptiles and birds. However, these types of seedings would be constrained by the coordinating measures and project constraints described on pages 2-6 through 2-13. Although these measures key in on important economic wildlife species, they are based on the fact that these species have large home ranges. Providing for them would in large part provide for a host of other species with smaller home ranges occupying similar associations.



July 8, 1982

Bureau of Land Management
Bruneau-Kuna Grazing EIS
3948 Development Avenue
Boise, Idaho 83705

TO WHOM IT MAY CONCERN:

Thank you for the opportunity to review the draft Bruneau-Kuna Grazing Environmental Impact Statement. Our comments are as follows on the proposed action:

- 1) Environmental Consequences - page iii, 4th paragraph -- If proper management principles are applied, adverse impacts on range ecological condition probably would not occur.
- 10.1 2) Page 2-6, last paragraph -- It appears that you are attributing the poor and fair condition of the 153 miles of streams supporting red band trout totally to livestock grazing, yet the remaining 128 miles of streams also contain areas in fair condition! Could it be that livestock grazing is not the sole contributor and therefore should not always bear the brunt of the criticism?
- 10.2 3) Page 4-5, soil stability, paragraph 2 -- It is hoped that upon implementation of your proposed range improvement program, one would not see a significant increase in soil disturbance in the riparian areas but perhaps only a slight variance. Hopefully, through intensified management, soil stability would be maintained.

Polmy M. Carr (Acting)
Amos I. Garrison, Jr.
State Conservationist

- 10.1 Livestock grazing is not the only factor contributing to deteriorated fisheries habitat condition. Inventory data, however, indicates that it is the major factor. Wildlife use, geologic erosion, or other factors are not felt to contribute significantly to lower habitat conditions. The areas in fair condition, on the 128 miles of stream, are felt to be in this condition class because of moderate livestock use.
- 10.2 Because specific management systems were not proposed, impacts were based on a worst case analysis. The analysis assumed that only a limited amount of grazing deferment would be applied. As grazing systems are implemented, adverse impacts to riparian zones may be lessened.



Idaho Environmental Council

P.O. Box 1708
Idaho Falls, Idaho 83401

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Please reply to: 1920 N 7th Street
Boise, Idaho 83702

July 6, 1982

Mr. Martin J. Zimmer
Boise District Manager
Bureau of Land Management
3948 Development Avenue
Boise, Idaho 83705

Dear Mr. Zimmer:

This letter will serve to extend and clarify the testimony which I gave on behalf of the Idaho Environmental Council at the hearing on the Bruneau-Kuna Grazing Environmental Impact Statement Draft which was held in the Boise Public Library on July 1, 1982. As did the oral testimony, this letter will address three main issues: the Jack's Creek pipeline, the Wilderness recommendations made in the draft E.I.S., and a general comparison of the Proposed Action and the Reduced Livestock Use Alternative.

I. The Jack's Creek Pipeline

It appears from figures given in the draft E.I.S. that the cost to the U.S. taxpayer of the Jack's Creek pipeline will be \$11,000. This may be low, but even if it is not, the cost of these 19 miles will be almost \$6000 per mile. Since the cost of the other 86 miles of pipeline proposed amounts to only \$2000 per mile, we question whether such a costly project should be built.

We observe that no benefit/cost analysis is done for the pipeline. Perhaps this should not be surprising since the costs will be borne by the taxpayer whereas the benefits will accrue primarily to the permittees using two grazing allotments. Whether this is two ranchers or 20, this project still appears to be a rather large subsidy to a small part of a minor industry.

The pipeline would result in an increase of 2332 AUM's at an approximate cost of \$50 per AUM. In preparing this commentary we were unable to determine an exact value for grazing fees on these two allotments. If the fee is \$2.50 per AUM, it amounts to only a 54 per year return on investment. Even if it is \$3.00 per AUM, the annual return is only 6%. I can double either one of these figures at my Credit Union and thus, the pipeline does not appear to represent a prudent investment of taxpayer funds since its return is so low. We would probably be better off as a nation if we used the money to redeem part of the national debt.

11.1 We also note that no environmental assessment specific to the Jack's Creek pipeline has been done except for the comment that the pipeline might possibly

Bruneau-Kuna p. 2

- 11.1 displace 5-10 California bighorn sheep (5-10% of the herd in the Little Jack's Creek drainage) and cause the sheep not to expand into the Big Jack's drainage.
- 11.2 On the whole, the I.E.C. opposes the pipeline and we urge the B.L.M. to return to its original proposal to obtain the extra forage through improvements on Wickney Tree Dome. At the very least, the project should not be approved until a thorough, honest, and separate benefit/cost analysis and E.I.S. are done.

II. Wilderness Recommendations

- 11.3 We support the B.L.M. recommendation for Wilderness designation for the Owyhee River, Sheep Creek West, and all the other recommended areas. We are not in agreement with the dropping of portions of Big and Little Jack's Creeks, Duncan Creek, Pole Creek, and the Bruneau Plateaus. The B.L.M. has given no rationale for doing so and we feel that all these areas have wilderness values which outweigh any other combination of values. Therefore we urge that they be recommended for Wilderness.

III. Proposed Action vs. Reduced Livestock Use Alternative

- 11.4 The Proposed Action (PA) will cost the U.S. taxpayer \$2.9 million together with \$8400 in annual maintenance while the Reduced Livestock Use Alternative (RL) will cost only \$2.6 million plus the same amount of annual expense. For the PA, the present net worth of the first 20 years return to the Treasury is \$3.6 million and for the RL it is \$3.2 million. A simple division reveals benefit/cost ratios (to the U.S. taxpayer) of 1.24 for the PA and 1.23 for the RL, almost equal. The income to the Treasury after five years of the PA is \$320,000 (or 11.3% return on investment) and that of the RL is \$286,300 (or 11% return on investment). After twenty years, the annual income to the Treasury generated by the PA will be \$446,000 (15.3% annual yield) and by the RL \$395,700 (or 15.2%). Thus economically, the two alternatives are just about equal except that the RL is designed to cost no more than the receipts actually obtained whereas the PA will require a Federal subsidy. In one other respect the RL is clearly superior: it will result in an increase of 147 jobs after 20 years compared to the 132 generated by the PA.

In terms of forage, both alternatives allocate the same amount to wildlife, 2332 AUM's. The PA allocates more forage to livestock after 20 years, 269,785 AUM vs. 242,049 AUM for the RL. However these 242,049 AUM still represent a 28% increase over the average actual use during the last five years. The RL leaves almost four times as much forage unallocated, and hence available for wildlife, as does the PA (50415 AUM vs. 11196 AUM).

On the balance, then, the I.E.C. supports the Reduced Livestock Use Alternative because

- it provides more jobs
- it is less costly to the taxpayer
- it will benefit the Bighorn sheep population
- it will improve wildlife habitat, fisheries, and the environment in general
- it will provide the greatest long-term protection for the total resource.

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In summary, the Idaho Environmental Council

- opposes the Jack's Creek pipeline,
- supports Wilderness designation for all WMA's in the area covered by this document, and
- urges that the Reduced Livestock Use Alternative be chosen as the preferred alternative and thus become the proposed action and that the forage allocated to wildlife be increased.

Thank you for the opportunity to comment.

Sincerely,

Alan R. Hausrath

Alan R. Hausrath
President, Idaho Environmental Council

- 11.1 See Response No. 2.2.
- 11.2 See Response No. 2.1 and 3.1.
- 11.3 See Response No. 2.5.
- 11.4 See Response No. 5j.1.

Big Springs Ranch
20210 Ave. 176
Porterville, Ca. 93257

July 6, 1982

Marvin J. Zimmer, District Manager
Bureau of Land Management
Boise District Office
3948 Development Ave.
Boise, Id. 83705

Dear Mr. Zimmer:

I am writing in response to the Bruneau-Kuna Grazing EIS and on behalf of Big Springs Ranch.

Given the alternatives offered, I would favor alternative #3, increased livestock use. The development of the watering system on the Jack's Creek plateau together with the other proposed range improvements would enable more effective use of the forage resource for both domestic livestock and wildlife in the area. Greater revenue would be generated for both the B.L.M. and the local economy. Current economic philosophy favors a maximum return approach to any business proposal, giving recognition to preservation of existing environmental conditions.

In the particular case of Big Springs Ranch, we do not want the proposed decrease or increase in A.U.M.'s on two of our allotments. Development of the water system together with a well co-ordinated management plan will meet the long term objectives of both the Ranch and the B.L.M.

If increased grazing can be properly implemented, the local economy will be strengthened. Without a strong economy in Idaho the other values considered will be purely academic.

Thank you for your consideration of my comments.

Sincerely,

J. Less Guthrie
J. Less Guthrie
Big Springs Ranch

JLG:meh
CC: Vic Kurten
Robert Kopple
Joe Pressutti

UNITED STATES DEPARTMENT OF AGRICULTURE
FOREST SERVICE
324 25th Street
Ogden, UT 84401

1950

JUL 9 1982



Mr. Martin J. Zimmer
District Manager
Boise District Office
Bureau of Land Management
3948 Development Avenue
Boise, ID 83705

Dear Mr. Zimmer:

We have reviewed the draft Bruneau-Kuna Grazing Environmental Impact Statement and find it to be concisely and well written, with better than average display and evaluation of fish and wildlife values. Responsible personnel are to be complimented. However, we do have a couple of "problems" with the DEIS. They are as follows:

- 13.1 1. Which of the alternatives analyzed is the selected alternative? It is not clear where the proposed action originated.
- 13.2 2. Since the EIS area joins National Forest lands and there are 23 operators who have Forest permits, are there any coordinating needs?

Some further comments from our WL Staff include the following:

Chapter 2 - Description of the Proposed Action and Alternative. Good statement of objectives under proposed action (2-1 and 2-3); same applies for remainder of discussion of this section, namely vegetation allocation, grazing management, improvement, or protection measures, project treatments, implementation schedule, and provision for monitoring. Table 2-12 (2-24 and 2-25) effectively displays the summary of impacts over a 20-year period.


Chapter 3 - Description of the Affected Environment. There is good coverage and description of terrestrial and aquatic wildlife resources. This is one of the better quality jobs we have seen to date.

Chapter 4 - Environmental Consequences. Same comment as on Chapter 3.

Chapter 5 - Consultation and Coordination. There has been very broad coverage. It appears that the "right" agencies, organizations, and individuals have been contacted.

Thank you for the opportunity to review your DEIS and to make suggestions.

Sincerely,


RICHARD K. GRISWOLD
Director, Planning and Budget

- 13.1 The proposed action is the preferred alternative at this time. However, the final decision will not be made until after the Final EIS has been completed. We will issue a Rangeland Program Summary which will describe the selected management actions. The proposed action originated from the Management Framework Plan for the affected area. We have expanded the description of the relationship between the proposed action and these plans in the revised proposed action.
- 13.2 As allotment management plans are implemented, considerable coordination needs are anticipated on those allotments where operators move to the Forest Service from BLM ranges.



United States Department of the Interior

GEOLOGICAL SURVEY
RESTON, VA 22092

In Reply Refer To:
EGS-Mail Stop 760

JUL 6 1992

Memorandum

To: District Manager, Bureau of Land Management
Boise, Idaho

From: Assistant Director for Engineering Geology

Subject: Review of Bruneau-Kuna Grazing draft environmental statement,
Idaho and Nevada

We have reviewed the draft statement as requested in your letter.

14.1 An inconsistency in statements regarding preservation of wilderness values should be corrected. It is stated in the Summary that "Wilderness values would be maintained on most wilderness study areas" (p. iii, par. 5). Later it is stated that "All wilderness values would be protected in lands under wilderness review" (p. 2-13, item 6).

14.2 In addition to the brief statement that provisions will be made to avoid dewatering natural water sources (p. 2-12), the typical occurrence of ground water and the long-range potential for ground-water impacts from the proposed management program should be discussed.


for James F. Devine

- 14.1 The statements on page 2-13 would restrict the development of projects which would impair an area's suitability for wilderness. Projects proposed in any of the wilderness study areas would not be done if they did not comply with the Wilderness Interim Management Policy. As site specific projects are proposed their impacts on wilderness suitability will be evaluated through the EA process. The statement in the standard operating procedure section for the proposed action has been changed. See the revised description of the proposed action.
- 14.2 See the text change section for page 4-5.

Owyhee County Commissioners

COURTHOUSE
MURPHY, IDAHO 83650

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July 12, 1982

BRUCE BOWLER
LAWYER
244 SONNA BUILDING
BOISE, IDAHO 83702
PHONE 343-6072

July 13, 1982

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Bureau of Land Management
Bruneau-Kuna Grazing EIS
3948 Development Ave.
Boise, ID 83705

We the Owyhee County Commissioners urge you to give serious consideration to adopt the alternative No. 5 as outlined by Frank Bachman on the Bruneau E.I.S. We also recommend that you go on the 50% utilization of grasses instead of the biological limit. We are in complete agreement that the watering of the plateau between Big and Little Jacks Creek can do nothing but help the multiple use concept, as well as being very beneficial to the big horn sheep. We feel there is no suitable areas for Wilderness in Owyhee County.

Donald L. Davis
Donald L. Davis, Chairman

Ernie Bahem
Ernie Bahem

James W. Purdom
James W. Purdom

Bureau of Land Management
Bruneau-Kuna Grazing, EIS
3948 Development Avenue
Boise, Idaho 83705

Re: Bruneau-Kuna Grazing Environmental
Impact Statement

Gentlemen:

I appreciate your supplying to me a copy of your Draft Environmental Impact Statement for Bruneau-Kuna Grazing and have made study of the same, and personally traveled the Jacks' Creek Plateau on June 20, 1982, examining the areas in the vicinity of the gas pipeline along which approximate route is indicated your proposed action for development of 19 miles of water pipeline to expand cattle grazing areas.

Examination was made of the native forage which still exists because of being out of reach of cattle resulting from lack of water supply. This terrain along the east rim of the Little Jacks Creek Canyon does not contain lots of forage but does serve purposes of deer and big horn sheep ranging in the region. It is a fallacy that this sort of water development aids wildlife, and can only be credited as federal subsidy for cattle. The cattle people perpetrate the hoax that the higher distribution of water benefits the public interest in wildlife, but experience shows that the cattle so dominate the watered areas that the wildlife receive little or no benefit from such developments.

The reversal of your previous position to not construct the Jacks Creek pipeline by your proposed action to now do

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so is serious public interest mistake which can only be regarded as overly subsidized sop for the Davis cattle allotments. It is amazing how much wording you can put into your environmental statement without addressing the real nitty-gritty of the important issues, particularly the economic ones about costs to be borne by the United States tax payers who really own the property. If your impact statement would honestly formulate a cost-benefit ratio of the actual public benefits that would flow from such pipeline, it would undoubtedly be seriously negative. Your statement seems to deliberately obscure the important facts, and your included maps are so sketchy that they appear confusingly deceitful, i.e., the gas pipeline is not identified, the owners of the properties to be benefited are not disclosed, and many basic landmarks are not shown.

While your statement contains much detail, it is sadly lacking in the substantive environmental impact that concern the real public interest, i.e., what would happen to the Little Jacks Creek big horn sheep if cattle are induced to graze the few remaining native grasses of the rims of the canyons. Your experts could quickly conclude that this would likely wipe out the big horn sheep and seriously deplete the deer. You seem to be acting as handmaiden of the cattle industry. Your proposed action to expand cattle grazing in already seriously overgrazed areas is absurd and does not address the real public interest involved.

If the Jacks Creek pipeline were built, it would only be short time until the whole Jacks' Creek Plateau was overgrazed. Such special favored benefits to a hand full of cattlemen could never be justified from any public interest standpoint. The cattle people do not deserve this kind of wetnursing at the expense of the American tax payer.

As embarrassing as it would prove to the cattle people involved, you should complete a detailed economic analysis of the Jacks Creek pipeline project including a cost-benefit assessment. This should specifically include the economic value of the big horn sheep including the ones which would be eliminated and the value of their potential on a lost or continuing basis in the Jacks Creeks areas. This would show that the big horn sheep, deer, and other wildlife have far greater public interest values than federally subsidizing the private interests of the few cattle grazers involved. The pipeline project deserves a full environmental impact statement on its own. The pipeline is the biggy that needs honest exposure of the designed beneficiary.

Your bias to accommodate the cattle industry is violation of your public trust as steward of the public lands, and the thrust to expand rather than reduce numbers of cattle grazing in this overgrazed area is inexcusable, and bad administration. Your repeated reference to your objective to assist the ranching community in a "strengthened feeling of well being" aborts the public interest in their lands. The cattle have been the destroyer of the viability of our public lands, and politics should not now salvage them from their selfish greed, and you should not be participants in their con-games.

You should select your Alternative 4 for reduced livestock use to become your proposed action. Your wildlife AUMs at 1% of the forage, with 96% allocated to cattle is blatantly ridiculous. Wildlife AUMs should be substantially increased because that is where the public interest lies in utilization of their public lands.

Please notify me of any actions to affect the Jacks' Creek Plateau.


Thank you kindly.

Very truly yours,

Bruce Bowler
Bruce Bowler

BB/kmk
cc: Hon. Jim McClure, USS
Hon. Steve Symms, USS
Hon. George Hansen, MC
Hon. Larry Craig, MC
Hon. Clair M. Whitlock

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- 16.1 We recognize that concentrations of livestock around new water sources would cause localized vegetation depletion but we felt the negative impacts associated with this would be offset by the addition of water in unwatered areas. Wildlife guzzlers would be provided in addition to livestock troughs on the Jacks Creek Pipeline.
- 16.2 The maps are not intended to be deceitful. Certain landmarks (gas pipelines etc.) are not shown because it is felt that additional detail would detract from the resource information being presented. Individual property ownership was not identified because of the fact that showing ownership would not clarify the impact assessment. Map 2-5 shows the gas pipeline location via symbol .
- 16.3 The impacts to bighorn sheep are identified on pages 4-7, 4-39, and 4-40.
- 16.4 See Response No. 2.1.
- 16.5 See Response No. 2.2.
- 16.6 See Response No. 2.3.

July 12, 1982

Mr. Martin J. Zimmer
Boise District BLM
3948 Development Avenue
Boise, Idaho 83705

RE: Public comment on the Draft Bruneau-Kuna Environmental Impact Statement

Dear Mr. Zimmer:

I appreciate this opportunity to provide review of your recently released Draft Bruneau-Kuna Environmental Impact Statement, which outlines the proposed BLM management and development programs for these 2,379,014 acres of public land for the next two decades. The plan is significant since it encompasses many irreversible decisions - such as the future for Wilderness and a number of ecologically sensitive species and sites in the Resource Area - as well as more malleable resources including fisheries, water quality and range condition. In reviewing this document a number of significant issues were immediately evident which do not appear to conform to the public interest.

1. The Jacks Creek Pipeline

I was amazed to discover that the BLM has now reversed its earlier, well founded and defended decision not to install the pipeline. The previous decision received overwhelming public support (84% of over 100 letters opposed the pipeline), and the BLM acknowledged the issues and arguments forwarded as a point well taken. In fact the BLM was lauded by many conservationists for the level-headed decision it reached in regard to not allowing the pipeline. This OEIS precipitously calls for the reversal of the decision, and no data based logic is provided as a scientific foundation justifying the reversal to the public.

- 17.1 To reiterate some of the values of the area, the FEIS should reflect the fact that historic light grazing pressure and lack of a permanent water source has allowed the survival of a unique native grassland habitat on the plateaus adjacent Big and Little Jacks. This native grassland formation provides year-round forage for mule deer, including wintering opportunity which is limited elsewhere in Owyhee County, winter habitat for antelope, and supports bobcat, sage grouse, and many other wildlife species. It is my understanding that the Desert Bighorn Sheep herd of ca. 100 animals represents 3% of the world population, and the Department of Fish and Game has ear-marked Big Jacks Canyon and some surrounding plateau sites as potential re-introduction habitat for animals to be taken from the blossoming Little Jacks Creek herd. For what data-based reason has the BLM now rejected its earlier recognition that cattle and bighorn sheep compete for grazing habitat (the reason the pipeline was originally denied), and BLM's estimation that range improvements nearby would provide more cattle forage at less cost - without impacting the bighorns nor the plateau ecology?

- 17.2 The proposed pipeline would cross 19 miles of public land extending through the heart of the Jacks Creek plateau, reducing the existing Little Jacks bighorn population by 5-10 individuals and likely eliminating the Fish and Game identified reintroduction sites from suitability. Obviously, some of the best native grasslands in Owyhee County would be degraded, reducing both its ecological and scientific values.

- 17.3 I strongly oppose the construction of any pipeline on the Big Jacks/Little Jacks plateau. The BLM has not provided any data whatsoever to justify the reversal of its original decision, which was designed upon the basis of identified values, data, public trust issues, and clear public mandate through the comments submitted. The BLM should return to its original concept of improving the range quality on Hickney Tree Dome to supply the cattle forage this pipeline proposal could provide.

- 17.4 This OEIS is not legally adequate because it does not provide an accurate cost estimate or benefit-cost analysis for the pipeline. Incredibly the only apparent beneficiaries of the pipeline, now expected to cost over \$163,000, are two cattle ranchers - and even so only 2300 AUMs of cattle forage would be accrued! As the BLM is likely aware, a recent study by economist Phillip Meyer* has shown that anadromous fishery values have never been adequately credited or valued, and that power need and worth has been consistently over-rated. Meyer alleges that the reason power output has progressively increased over the decades, while anadromous fish productivity in the Columbia River drainage has correspondingly declined, is due to the fact that decision-makers have employed "an unbalanced assessment of the relative magnitude of benefits, costs, and risks for power and fish associated with alternative Columbia River hydrologic flow and structural policies." I contend that the same lack of real valuation is true of the BLM in its comparison of values other than grazing on the public lands to cattle AUMs. There is no way that 2300 AUMs of cattle forage can in any sense outweigh the values to be sacked by the pipeline boondoggle, and the BLM should contract Phillip Meyer or some equally credentialed third party to examine the issue. In terms of the public trust, try to explain to the nearly 100 Idaho residents whose opposition is in the record - or the other 200 million Americans who also own the land - why all other values should be forfeit so that two politically savvy ranchers can make a little more money.

- 17.5 Clearly the construction of the pipeline constitutes a major federal action, thus a full EIS following NEPA guidelines should be completed on the pipeline proposal before BLM approves the concept. I request to be notified of any actions affecting the Big Jacks/Little Jacks plateau and the WSAs.

2. AUM Allocations

- 17.6 Besides the pipeline mistake, the other major issue in this OEIS which needs addressing is the ripoff of wildlife AUM allocations for cattle. Clearly to everyone except the handful of ranchers who would profit from added cattle permits - the only Alternative that makes any sense is Alternative 4, the Reduced Livestock Use Alternative. Alternative 4 should be BLM's proposed action and the preferred alternative. The BLM currently proposes an alternative granting 1% of the available forage to be allocated for wildlife, with over 96% of the remaining resource going to cattle. The BLM assumption that wildlife has free forage opportunity in steep canyon bottoms and other areas cattle cannot negotiate may be true for bighorn sheep, but it leaves out everything else (antelope, mule deer, sage grouse, and so forth). This kind of attitude makes a mockery of the concept of balanced use and would be red-flagged by any high school student familiar with the FLMPA. This reminds me of the old ploy of developers calling cliffs open space.

3. Wilderness

- 17.7 I support the BLM decision to recommend Wilderness designation for the Owyhee River Wilderness, Sheep Creek West, and all of the other areas. As I have stated in other letters, I urge the BLM to recommend designation of the dropped portions of Big and Little Jacks Creeks, Duncan Creek, Pole Creek, Sheep Creek East, and that the Bruneau Plateau be reconsidered. The public values of wilderness areas include watershed protection, recreation, scenic preservation, the conservation of wildlife that requires a wilderness habitat, and scientific research. These values far outweigh relatively small economic gains for a few. We have got to get away from the history of undervaluing our natural resources, giving them away to special interests, letting ranchers dictate policy through political arm-twisting. This is the last chance these areas have for ever getting wilderness recognition, and obviously wilderness values cannot otherwise receive adequate protection. (Just as an example, Idaho has never implemented the FLMPA's Area of Critical Environmental Concern option, and special management categories can be changed with the administrative guard.)

Thank you for your consideration. I urge you to read the following reference (which I am forwarding under a separate cover to be docketed in the record of the Owyhee Wilderness Plan Amendment/EIS):

U.S. General Accounting Office, July 5, 1977. Public Rangelands Continue to Deteriorate. GAO-77-88.

Respectfully,

Peter A. Bowler
Peter A. Bowler
Star Route
Bliss, Idaho
83314

*Meyer, Phillip. March, 1982. Fish, Energy and the Columbia River: An Economic Perspective on Fisheries Values Lost and At Risk. Prepared for the Northwest Resource Information Center.



- 17.1 The historic use of the Jacks Creek plateau by livestock is unknown. Current range condition and livestock use is described on page 4-16.
- 17.2 The rationale for the Jacks Creek Pipeline has been expanded. See the revised description of the proposed action.
- 17.3 See Response No. 3.1.
- 17.4 The revised description of the proposed action provides an updated cost of the pipeline. Also see Response No. 2.1.
- 17.5 See Response No. 2.2.
- 17.6 See Response No. 2.3.
- 17.7 See Response No. 2.5.

DANIEL A. POOLE
President
L. R. JAHN
Vice President
L. L. WILLIAMSON
Secretary
JACK S. PARKER
Board Chairman

July 12, 1982

Bureau of Land Management
Bruneau-Kuna Grazing EIS
Boise District Office
3948 Development Avenue
Boise, Idaho 83705

Gentlemen:

The Wildlife Management Institute is pleased to comment on BRUNEAU-KUNA GRAZING ENVIRONMENTAL IMPACT STATEMENT DRAFT, Idaho.

18.1 The plan is not acceptable for wildlife. Any allocation of forage that provides 96.1 percent for livestock and only 1.1 percent for wildlife seriously curtails improvement and enhancement of the wildlife resource.

The plan is better than most for riparian management. We commend BLM for facing up to some of the fencing needs. However, the detailed management proposed on page 2-7 is only a shopping list and there is no assurance that the needed amount of fencing will be done.

18.2 We oppose the Jack's Creek pipe line. Although the preferred alternative does not provide for lateral lines, we believe it will be only a question of time until they would be constructed to the detriment of bighorn sheep. New water policy will give water rights to permittees, giving them a vested right to the allotments since they would control the water. Private water rights will insure that wildlife water will be cut off when cattle water is shut off.

18.3 Examination of the maps shows land treatment (11.6 percent of the planning unit), both existing and proposed, is concentrated. This poses a serious threat of monoculture unless diversity standards are strictly controlled.

18.4 Our principle objection to the plan is to its economics, particularly cost-benefit ratios, which are not shown in the plan.

BLM Development Costs	2,904,000
Increased Livestock AUM	67,510
Average Cost per AUM	\$43.02
Number of Permittees	79
Average Increase in AUM per Permittee	855
Average Cost (subsidy) per Permittee	\$36,763.00

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18.5 The discussion and chart on page 4-20 attempt to show this is economic because \$4.1 million will be collected from grazing fees in twenty years. This is a misleading use of figures. It represents total grazing fees, the bulk of which is from livestock AUM already grazed. It includes no management costs or administration of grazing and ignores the interest cost of the money to government.

A realistic appraisal would be based only on income from increased AUM's and offsets for certain public benefits.

18.6 With low grazing fees, we doubt that the \$2,904,000 would be returned to the Government in any reasonable time.

There has been a 25 percent decrease in the BLM wildlife budget since 1981 for the entire state of Idaho, yet massive development is planned to benefit only 79 permittees.

Some specific comments follow:

Page 2-7 #5 and 6 should always be required.

Page 2-8 There always is the alternative of not developing water on historic trails. Livestock do not always need the ultimate priority.

Page 2-9 1st Paragraph. Weasel words; under no circumstances should livestock water be developed within bighorn range.

18.7 Table 2-12 The wildlife figures indicate that management priority and decision should favor wildlife on winter ranges. This is not done. Too much browse is allowed for livestock use. (P 2-9)

18.8 Page 3-11 What are "native valley Quail?" Are they not introduced?

Page 4-5 Mule deer will not receive much benefit by "slightly reducing competition."

Page 4-6 1st Paragraph. There is no real assurance that the proposed utilization, cover requirement and grazing system development will occur. Failure of any one will kill the modest wildlife gains planned.

18.9 Page 4-6 Antelope. Why not adjust livestock stocking rates so some increase in antelope (a public resource) will occur?

18.10 Page 4-19 Range improvement. Reconcile \$4.2 million here with figures in Table 2-4.

18.11 Page 4-20 The economics are discussed earlier in our comments. Another omission in the BLM presentation is the failure to include interest costs to the government. What is needed is a comparison table of project-no project and limited to increased AUM, not existing AUM.

18.12 Page 4-21 It should be emphasized that the new employment from construction is temporary.

These remarks have been coordinated with William B. Morse, the Institute's Western Representative.

Sincerely,

Daniel A. Poole
President

DAP:1bb

- 18.1 See Response No. 2.3.
- 18.2 Livestock operators would not have the sole water rights on the Jacks Creek Pipeline. As provided by BLM's current water policy procedures, the permittees may elect to have their name included with BLM on the water permit. In any case, sufficient water rights would be reserved to provide for anticipated wildlife needs.
- 18.3 The map shows general areas where land treatment would occur. The entire area within shaded areas would not be treated because of inclusions of nonarable soils or vegetative types. In addition, the development constraints described in the proposed action would prevent large monocultures.
- 18.4 The benefit/cost ratios found in this EIS are intended to show the relative economic efficiency of each alternative in a general sense (see page 4-18). Benefit/cost analysis of individual projects is done in conjunction with allotment management plans, habitat management plans, or some other activity type plan following the completion of the EIS. Such analysis is done on an allotment basis and considers all improvements planned for that allotment as well as the benefits and costs. The Bureau's draft rangeland improvement policy, dated 5-12-82 has as its goal to "improve the condition of the public lands for multiple-use by investing in economically and environmentally sound rangeland improvements." It goes on to say that the Bureau will invest funds where they will produce a positive economic return and will achieve multiple-use management objectives with the least expenditure of public funds. The Idaho State Office of the BLM has issued instructions to all Districts to the effect that benefit/cost ratios must be submitted with each improvement planned in the annual budget submission (Idaho Instruction Memorandum's 82-72 dated 12-21-82 and 81-40 dated 11-10-80).
- 18.5 Management and grazing administration was considered a fixed cost in this analysis and not likely to change significantly due to the proposed action or alternatives. The grazing fees were not used in the calculation of the alternative's overall benefit/cost ratio. The net present worth of the current average annual grazing fees in the EIS area (over 20 years) is \$3.6 million. Of all grazing fees collected, only that portion returned to the Federal Treasury (37 1/2%) is not required to be used for range improvements in accordance with the Taylor Grazing Act of 1934, as amended.
- 18.6 Assuming current actual use of 189,800 AUMs, \$2.9 million in grazing fees would be collected in roughly 8 years.
- 18.7 It is felt that this amount of vegetation would provide adequate forage for desired population levels.

- 18.8 This is an error, the California or valley quail is an introduced species in Idaho.
- 18.9 Based on the lack of predicted range improvement on antelope winter/spring ranges, antelope populations were predicted to remain static in the Draft EIS. Since this does not meet our land use planning objective, improvement of the antelope winter/spring ranges will receive management priority (see measures to improve antelope habitat in the revised proposed action). These measures would allow antelope populations to increase.
- 18.10 Page 4-19 says the \$4.2 million in range improvement costs is broken into government costs of \$2.9 million and rancher costs of \$1.3 million. Table 2-4 says the same thing.
- 18.11 Interest costs of money used in developing range improvements is captured in the discounting process of estimating benefit/cost ratios and net present worth (see page 4-18). See page 2-26, Table 2-12 for a comparison of impacts without the proposal (Alternative 1) and with the proposal and other alternatives.
- 18.12 Comparison of year 5 and year 20 employment impacts in Table 4-8 show the majority of construction jobs to be temporary in nature.



United States Department of the Interior

NATIONAL PARK SERVICE

Pacific Northwest Region
Westin Building, Room 1920
2001 Sixth Avenue
Seattle, Washington 98121

IN REPLY REFER TO:

12DID3(PNR-RE)
DES-82/25

July 15, 1982

Mr. Martin J. Zimmer, District Manager
Bureau of Land Management
Boise District Office
3948 Development Avenue
Boise, Idaho 83705

Dear Mr. Zimmer:

We have reviewed the Draft Bruneau-Kuna Grazing EIS, and our comments follow:

It appears that recreation resources will not be greatly affected by any alternative, but the proposed action is characterized as causing recreation quality to improve, and recreation use to increase.

With regard to wilderness, we agree with your procedure of protecting both suitable and non-suitable acreage within wilderness study areas by managing such lands under the Wilderness Interim Management Policy until they are released from the wilderness review process.

Your coordination with the State Historic Preservation Officer with regard to cultural or historic impacts should be continued and we will defer to his comments in this regard.

Thank you for the opportunity to comment on this document.

Sincerely,

Richard L. Winters
Associate Regional Director
Recreation Resources and
Professional Services

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1121 Willow, Caldwell, Idaho 83605
July 15, 1982

Martin J. Zimmer
Bureau of Land Management
Bruneau-Kuna Grazing EIS
Boise District Office
3948 Development Avenue
Boise, Idaho 83705

Dear Mr. Zimmer:

During the past 23 years of teaching, I have found that the Idaho students, in general, were very interested in conservation. I certainly am, and I like to think I am writing in behalf of those students as well as myself in support of conservation of the Owyhee area by the restoration of the denizens of that historic, scenic, and valuable land.

I have seen what original land environs look like when a small amount of protection to that environ is made: grasses which grow taller than a man, wildlife returning, rare flowers, growing blooms and seed again.

Yes, I definitely support the original habitat concept!

Sincerely,

Enid I. Mooban

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Martin J. Zimmer
July 16, 1982
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July 16, 1982

Martin J. Zimmer
Boise District Manager
Bureau of Land Management
3948 Development Avenue
Boise, ID 83705

Re: DRAFT ENVIRONMENTAL IMPACT STATEMENT ON THE PROPOSED
GRAZING MANAGEMENT PROGRAM FOR THE BRUNEAU-KUNA PLANNING
UNIT AND THE SOUTHERN PORTION OF THE OWYHEE RESOURCE AREA
(Garat and "45" allotments)

Dear Joe:

As noted in my statement at the public hearing (Boise, Idaho,
July 1, 1982) on the above-referenced document, further written
comments on its contents would be submitted by the Natural Re-
sources Defense Council, Inc. (NRDC) and the Idaho Wildlife Fed-
eration, Inc. (IWF). Accordingly, we submit the following com-
ments for consideration in drafting the Final Bruneau-Kuna Grazing
Environmental Impact Statement (EIS).

As you no doubt already know, NRDC and IWF are both non-profit
conservation membership organizations that have long been con-
cerned about the management and current conditions of the publicly
owned rangelands in Idaho and other western states. We have sought,
urged, and supported Bureau of Land Management (BLM) efforts to
manage livestock grazing on these lands according to the multiple
use and stewardship principles mandated by the Federal Land Policy

Affiliated with the National Wildlife Federation

Martin J. Zimmer
July 16, 1982
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alternatives considered, including the proposed action, and
those plans. For example, although it lists "major objectives"
of the proposed action, pp. 2-1 and 2-2, it does not explain
the relationship of those objectives to plan "recommendations"
or the "coordination guidelines for multiple use and management
objectives to be achieved for each class of land use or pro-
tection," p. G-3. In fact, the draft provides no description of
the recommendations or guidelines. It also does not provide a
description of the basic land allocations and tradeoffs which
they represent and the reasons therefor; nor, does it provide an
analysis of those reasons and the adequacy of the proposed rec-
ommendations.

Similarly, the draft EIS, p. 1-1, states: "the purpose of the
proposal is to maintain or improve soil, water and vegetative re-
sources within the area. It is also intended to provide forage for
livestock and wildlife using the area." The draft does not describe,
explain, or otherwise provide any clue as to how this purpose was
arrived at or what, if any, relationship it has to individual MFPs.

The subject draft not only fails to explain the relationship be-
tween the proposed action and the area's land use plans, it pro-
vides no underlying reasons for the major objectives of that action,
pp. 2-1 and 2-2, and its major components. For example, the draft
totally fails to explain why BLM has decided to implement intensive
management of livestock in the area. Nor does it provide any ex-
planation for other elements of the proposed action or for the bias
to accommodate livestock grazing that characterizes these elements,
including:

the proposal to increase livestock use over current levels
despite the draft's own admission (Chapter 3, p. 3-3) that
73 percent of the range is currently in poor and fair condi-
tion; that current, apparent trend indicates 82 percent of
the area is either downward or non-apparent (static); and

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Martin J. Zimmer
July 16, 1982
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wildlife habitat (deer, antelope, sage grouse, etc.) is
rated as being in poor to fair ecological condition as re-
gards their particular habitat requirements;

- the proposal to make a concerted effort to develop water
sources within the next 5 years, p. 2-5, -- at considerable
public expense -- to utilize and/or make available to
domestic livestock forage in areas not currently grazed
by them;

- the proposal to allocate forage initially to livestock on
the basis of "the total amount of forage which could be
properly used by livestock provided allotments are ade-
quately watered." p. 2-5 (emphasis added);

- the proposal to violate the Little Jacks/Big Jacks Creek
area through construction of a water pipeline, an action
which could jeopardize the re-introduced California bighorn
sheep population, p. 4-7, and cause an irretrievable loss
of five to ten animals;^{1/}

- the proposed disproportionate allocation of forage to wild-
life, and the apparent attempt to buttonhole wildlife into
a corner of "reasonable numbers" and keep them in that corner
as illustrated by the use of the same allocation for all "al-
ternatives," see Table 2-1, p. 2-3;^{2/}

^{1/}We were unable to find any place in the draft at which the
fact that this result would violate one of the "major objectives"
of the proposed action was even acknowledged. Indeed, Table 2-12,
wrongly states that management goals will be met with implementation
of the proposed action.

^{2/}Much of the discussion on fisheries and wildlife contained
in Chapters 2 and 3 portray the adverse impacts of grazing upon
fish and wildlife habitat in general -- and leave it there. There
is little or no specific assessment made on specific areas, prac-
tices, or species. Why not, and what role does forage allocation,
hence intensity of grazing, have on the fish and wildlife resources
of the Bruneau and Owyhee Resource Areas involved?

21.9

- the extensive project development and land treatment proposals, pp. 2-9 and 2-10;^{3/} and

21.10

- the economic analysis which is no more than an enumeration of "ranch budgets" and ignores all other value(s) of the public lands, including other economic values, and all other public dependent upon or benefitting from such value(s) of the public lands.^{4/}

Other examples of the lack of balance which typifies the proposed action and the lack of adequate explanation which characterize the draft include:

- Forage allocation methodology: Either the 50% utilization level (take half/leave half) or biological limit level are accepted methods for determining allowable forage use levels. However, it seems the BLM proposes to impose a rather arbitrary and difficult to administer utilization level between the Bruneau and Owyhee Resource Areas. The stated rationale for this difference in use level allocation

21.10a

^{3/}The draft not only provides no justification for these projects, it provides no site-specific location for them or assessment of their impacts upon wildlife, watershed, or other resource/public value beyond a general claim of their benefit "to achieve better distribution of livestock, increase livestock forage production, improve watershed condition, and improve the conditions of areas for wildlife," p. 2-10.

We are shocked by the omission of this site-specific information since the Bureau has apparently long since prepared environmental assessments on many of these same projects. Unfortunately, it is impossible to relate those environmental assessments to the projects that are a part of the proposed action.

21.10

^{4/}All recreational pursuits: hunting, fishing, backpacking, etc. -- any value except rancher/livestock considerations are excluded from economic efficiency-equity consideration. There is no equity in such an analysis. Furthermore, not all costs of the proposed action are included, i.e.: administrative cost for the program (monitoring, etc.), should be costed out and accounted for in the economic analysis.

21.11

The remainder of the discussion on range suitability treats lack of water as a factor in determining suitability/suitability of the rangeland environment as regards livestock usage only. No discussion is provided of areas without water as they contribute to or accommodate other rangeland values, i.e., watershed, wildlife habitat, wilderness, etc.

21.15

Pages B-4 and B-5 are further variations on the same theme -- accommodation of livestock grazing with no rationale or trade offs given for the statements or conclusions made. Of particular interest is the matter of "Season of Use Restrictions" with the selection of the Proposed Action over the so-called Reduced Livestock Use Alternative (Alternative 4). Several discussions in the text, pp. v(?), 2-19, and 4-44 as well as Table 2-12, pp. 2-24 through 2-26, describe the many benefits accruing to the rangeland environment by delaying livestock turnout dates to May 15th. Even the "economic assessment" of this so-called alternative failed to fault this option to any extent. Why, then, was it dropped when the Proposed Action was selected? What rationale prompted this decision?

21.16

Monitoring. It is clear from the draft that excessive utilization or other "slippage," (delay in AMP development, etc.) in implementation and monitoring of the proposed action will prevent realization of the "benefits" which are predicted to result. See pp. 4-18, 4-19, and B-10. The draft explicitly assumes that the manpower needed to achieve the administration/monitoring that is part of the proposed action will be available to the Bureau. We submit that this assumption has never been justifiable, given the

is specious in our view and most difficult to monitor and enforce. It implies a degree of sophistication in management that does not track with BLM capability to administer such a program.

21.12

We take exception to the 50% use factor (Appendix B, p. B-1) for cheatgrass under any circumstance. Is BLM admitting defeat and agreeing to manage poor condition, over-utilized range as an annual range? To do so is to relegate such rangeland environments to continued abuse and an abandonment of management responsibility. It is hoped BLM could do better and devise a rangeland management program (inclusive of artificial rehabilitation) that will restore these rangeland environments.

Range suitability methodology. Appendix B, p. B-4, not only portrays the livestock bias of this draft, it also serves as an example of its sometimes misleading contents. A casual reading leaves an impression that adjustments for lands not suited for livestock grazing were, in fact, made. The second paragraph ends that impression when it is found that the claimed 65% adjustment for the McConnell Allotment (823) amounts to a whopping 2,522 acres out of a total EIS area of some 2.4 million acres and that this is the only area where adjustments were made for slopes in excess of 50%. Really, now, who is kidding whom?^{5/} And why?

21.13

^{5/}The draft EIS makes no secret that a Soil Vegetation Inventory (SVIM) and a third order survey (which meets the National Cooperative Soil Survey standards) was conducted in the EIS area 1979-81 and is available to BLM personnel for planning purposes, p. 3-4. The text states that the soil survey was used for evaluating land use potential helping establish potential natural plant communities, establishing initial stocking rates, and evaluating erosion hazards. However, the draft EIS does not explain why available soils/vegetative data were not made part of the subject document or how such data were used and/or interpreted in compilation and drafting of the draft EIS. Also, such data could establish the basis for range suitability (slope, erosion hazard, etc.), but were apparently overlooked in this regard. (continued, next page)

21.14

BLM's historic lack of adequate funding and personnel. Given the Bureau's current budget realities, to say nothing of the requirements of the new range policy, this assumption borders on deliberate misrepresentation. In addition to supplying the reasons and other omitted information identified above, the final EIS must explain what kind of monitoring will be done, provide reasonable estimates of its cost, assess the likelihood of receiving the needed funds, and analyze the environmental impacts of not having them.

21.17

In addition to failing to provide sufficient necessary information regarding the proposed action, its elements and its relationship to the area's land use plans, the draft EIS also fails to substantiate the environmental impacts that are predicted to result from implementation of the alternatives considered, particularly the proposed action. Indeed, the draft fails to specify any particular grazing system for any area, let alone analyze the impacts on that area. Instead, readers are asked to assume not only that the proposed action, including all its elements, was properly arrived at, but also that it will, in fact, "work." Thus, for example, the discussion of the environmental consequences of the proposal blithely asserts that "(p)roper stocking levels, implementation of grazing management, and proper utilization of key forage plants would benefit antelope habitat." P. 4-6. Similarly, despite the fact that the draft reveals that some negative impacts will result, the statement contains no discussion of any mitigating measures. More than any other defect, the "trust us" attitude which pervades the draft suggests that the Bureau has forgotten much of what it learned with so much difficulty regarding the contents of EISs.

21.18

As has been noted, we believe the alternatives considered in the draft impact statement have been improperly selected. While they do encompass various levels of livestock use, they clearly reveal a predetermined intention to implement intensive management on

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the vast majority of lands in the Bruneau-Kuna Planning Units and southern portion of the Owyhee Resource Area. Thus, no one expects BLM to discontinue livestock grazing totally in this or any EIS area.^{6/} Similarly, no one would want -- or expect -- BLM to permit the continued abuse of publicly-owned resources that is resulting from current management practices. Each of the two remaining so-called alternatives involves an intensive management scheme that imposes increased livestock demand upon a deteriorating or, at best, static resource base and is essentially identical to the proposed action (See Table 2-12, pp. 2-24 through 2-26). They are clearly not alternatives to the proposed action. Instead they are simply variations on it.

NEPA, however, requires the consideration of genuine alternatives, not variations. At a minimum, therefore, the final impact statement must consider a non-intensive management alternative.^{7/} Either this alternative or an additional one might well incorporate other MFP recommendations that may have been modified or rejected as well as comprehensive protection of bighorn sheep habitat, riparian ecosystems, and proposed wilderness areas (WSAs), etc., that are not addressed in the draft EIS.

^{6/}The principal reason for analyzing the no grazing alternative is to provide baseline environmental information against which to measure the impacts of all the other alternatives, including the proposed action.

^{7/}Reference is made to my comments dated January 18, 1982, where it was suggested to draft an alternative which addresses BLM's stewardship commitment under the FLPMA and PRIA -- a Multiple Use Alternative.^{8/} An alternative that fairly assesses resources, resource capability, and with land allocation predicated upon such criteria. You won't "maximize" anything, but could strive to achieve multiple use as defined in FLPMA, Section 103(c) and to realize the national policy and commitment as defined in PRIA, Section 2.(b), (2). And, in accordance with PRIA, Section 5.(c), rangeland improvements could be identified, programmed and funded (to the extent funds provided) through utilization of range betterment funds.

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If the two levels do not correspond to the BLM's new management categories, when will the new policy be applied in this area, how will it be applied and, most importantly, what changes will it necessitate be made in the proposed action? For example, will the proposed allocations have to be changed? Will other management actions be abandoned in any area as the result of their classification under the new policy and what will be the environmental impacts thereof? Similarly, how much additional money will be necessary to fulfill the added monitoring responsibilities envisioned by the new policy?

In conclusion, we reiterate our disappointment with this draft and the Bureau's biased approach to resolution of the serious resource allocation/management problems involving livestock which exist in the subject area. As indicated, this disappointment stems in large part from the Bureau's apparent willingness to ignore the progress made and the lessons learned since it first began writing these documents. In addition, as stated at the public hearing, our disappointment stems from the fact that the concerns and suggestions IWF submitted in response to BLM's request were ignored in drafting this document and in developing the proposed action.

We thank you in advance for your consideration of these comments. Hopefully, they will assist you and your staff in drafting an improved final grazing impact statement for the subject area that will lead to implementation of a sound, environmentally responsible rangeland program benefitting all publics rather than a

(continued from previous page) grazing systems, etc., that have yet to be determined. This conclusion reinforces our concern about the BLM's failure to provide sufficient information by which to assess and judge whether grazing systems (whatever they may be), seasons of use, utilization levels, etc., are applicable and enforceable.

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Finally, we are concerned about the draft EIS's apparent lack of compliance with two of BLM's current range policies -- water and grazing management -- and the lack of any means to relate the proposal to those policies. As you may already know, NRDC and IWF do not believe those policies will achieve management of rangeland resources in a manner benefitting all publics and their interest -- an apt criticism of the subject draft EIS. Leaving their substance aside, however, we have the following concerns about their relationship to the proposed action.

- Water. Given the extensive proposed water developments contemplated in the EIS, what is the status of such water under the BLM policy as regards wildlife, recreation, or other public use(s)? For example, were the Little Jacks Creek pipeline to be constructed providing extension of domestic livestock grazing into the area, who would file for the water rights, the BLM or the operator? When the grazing season ends and livestock are removed, will the water be turned off. Why wasn't information provided for this proposed project and all other proposed water developments to clarify this significant issue in the use and allocation of public land resources?

- Grazing management. How were the two levels of grazing management determined, pp. 2-5, 2-6? Do the "intensive" and "less intensive" categories correspond to the "I" (Intensive) and "C" (Custodial) categories of BLM policy? If so, how are they related? What input from the livestock operator and public, generally, led to the classification? On what data base were these classifications made and on what reasons were they based?^{8/}

^{8/}The document text leads the reader to conclude that the classification was made rather arbitrarily -- on the basis of plans (AMPs), (continued, next page)

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program that only accommodates a select user group and does so only through continued subsidization of public monies and public land values.

Sincerely,

William R. Meiners

William R. Meiners

Johanna H. Wald
by *William R. Meiners*
Johanna H. Wald

- 21.1 The land use plan objectives and rationale as well as the land use plan recommendations that would be required to achieve the objectives have been added to the revised description of the proposed action. Conflicting resource management recommendations, the proposed resolution for conflicting recommendations, the rationale for final recommendations and resource trade offs are also shown. The adequacy of the proposed recommendations is assessed in the environmental consequences chapter of the EIS.
- 21.2 The purpose for the proposed action has been expanded. See text change section.
- 21.3 See Response No. 21.1.
- 21.4 The revised description of the proposed action in Chapter II has been rewritten to clarify the description and rationale for these management measures.
- 21.5 See response above. The 19 miles of pipeline proposed in the proposed action would not jeopardize the bighorn sheep herd on Little Jacks Creek. The development of this portion of the pipeline may result in the displacement of 5-10 bighorn sheep from habitat currently used by the sheep. It is not known if these animals would be lost or not.
- 21.6 Reasonable numbers represent the future big game population goals for the Idaho Department of Fish and Game. Because forage is allocated initially to cover these future populations goals, the AUM allocation did not change over time. As a result of public input, the proposed action has been changed to provide for future wildlife allocation increases should the management goals for wildlife increase. See text change section.
- 21.7 Chapter 4, Environmental Consequences, describes the significant impacts of the proposed level of grazing use. Where appropriate, impacts are described for specific areas or species. This is done in those instances where impacts between areas are different. If impacts to a resource are similar throughout the study area, they are discussed on study area or population area basis.
- 21.8 The impact of forage allocations or the level of grazing use is discussed in both the terrestrial and fisheries sections of Chapter 4.
- 21.9 See response .4.
- 21.10 The economic analysis in this EIS looked at all elements of public land use that were quantifiable in economic terms. This included impacts to ranchers, hunters, and service support industries. The economics section has been expanded to show the economic value of increased hunter day use which was the only recreation pursuit
- 21.10a Site specific locations are not available for most projects at this time. As site specific locations are identified, an environmental assessment would be prepared to assess any impacts not addressed in this EIS. The impacts of proposed projects on wildlife, watershed, and other resource values was based on the type and nature of impacts that normally occur from this type of project development. Also see Response No. 27.12.
- 21.11 It is not possible to quantify the costs associated with monitoring at this time. It is anticipated that administrative costs as well as monitoring costs would remain relatively constant for the proposal and all alternatives except No Grazing or Continue Present Management.
- 21.12 Because livestock readily consume cheatgrass, during the spring months it is felt that 50% of its annual production can be grazed without exceeding the proper use levels of desired perennial vegetation which may also be present. Nowhere in the EIS area is BLM managing for annual rangelands. Utilization and trend studies will be established to monitor range condition improvement. If allocating 50% of the cheatgrass production to livestock results in over-utilization of desirable perennial vegetation, stocking levels would be reduced.
- 21.13 Forage was also not allocated on a portion of the rock outcrop range site (major canyonlands). This data has been added to the Final EIS. See text change section.
- 21.14 Soils/vegetation data was included in the EIS where it was felt appropriate to describe or clarify impacts. Because of the volume of data generated from the inventory, it is not possible to include all of it in the EIS. The survey was used as the basis for rangesuitability for selected sites. See comment .13. It was not used to determine suitability on other areas because data concerning the availability of livestock water, which must be used in conjunction with slope criteria in determining suitability, was not adequate.
- 21.15 The discussion of range suitability on these, page B-5, is limited to determining the level of grazing use that can be allowed while remaining within the capability of the soil and vegetative resources to maintain or improve their current condition. The suitability or use of the vegetative resource by and between other resources and livestock grazing is discussed in the description of the proposed action and in the environmental consequences chapter.
- 21.16 The rationale for the proposed action has been expanded in the revised description of proposed action. See text change section.
- 21.17 The type of monitoring studies anticipated is described in the monitoring section of the proposed action. The cost of this program cannot be determined at this time. Because the exact amount of funding or monitoring capability is not known, it is not possible to identify specific impacts of not having them. Some of the actions that may occur as a result of a reduced monitoring capability are: 1) the intensity or level of monitoring may be reduced, 2) forage increases, which would not be allowed unless monitoring studies demonstrate that additional forage is available, would not be allowed, and 3) the priority for monitoring various allotments could change.
- Livestock operators or other public land users could supply the necessary manpower to implement the monitoring program if Bureau funds are not adequate.
- 21.18 The revised description of the proposed action has identified additional measures to enhance or improve wildlife and other resources.
- 21.19 The development of an additional alternative was considered for inclusion in the Final EIS. However, an additional alternative was not developed due to the following reasons:
- 1) Mitigation measures and additional livestock management constraints have been incorporated into the proposed action which partially mitigate the adverse impacts associated with the proposed action.
 - 2) Alternative 4, Reduced Livestock Use, assesses additional measures which would eliminate adverse impacts and satisfy resource objectives that would not be obtained in the proposed action.
 - 3) The land use plan objectives and recommendations for the area does not indicate a need or opportunity to consider a non-intensive livestock management program for the area. In areas where grazing conflicts exist or where livestock grazing use is inappropriate, conflicting resource recommendations have been resolved in favor of other resource uses or values.
 - 4) Land use plan objectives are attainable through the proposed action or alternatives presented.
 - 5) Resource capability was considered in the development of the proposed action. Measures or constraints that are necessary to ensure that the proposed level of grazing use or project development are within that capability have been incorporated into the revised proposed action and would be implemented should the proposed action be selected.
- 21.20 The revised description of the proposed action addresses water rights and the provisions for wildlife water on proposed water developments.
- 21.21 The rationale for intensive and less intensive management is described in the revised description of the proposed action. These categories do not correspond to the "Maintain", "Improve", or "Custodial" categories of the new Grazing Management Policy (BLM Instruction Memorandum No. 82-292). Implementation of the new grazing management policy will be initiated following completion of the EIS. Development of criteria for management categories and the placement of allotments into appropriate categories will be accomplished with input from livestock operators and other interested publics. It is not anticipated that this categorization would necessitate any changes in the proposed management for the area. The categorization will be primarily used to aid in setting priorities and implementing of management proposals and monitoring needs. It is not anticipated that any additional monitoring needs would be required as a result of the new policy.



United States Department of the Interior
FISH AND WILDLIFE SERVICE

AREA OFFICE: IDAHO AND NEVADA
4620 OVERLAND ROAD, ROOM 238
BOISE, IDAHO 83725
FTS. 544-1960; COMM. 208-334-1960

22

22

DATE: July 16, 1982
TO: District Manager, Bureau of Land Management, Boise, Idaho
FROM: Area Manager, FWS, Idaho/Nevada Area, Boise, Idaho (ES)
SUBJECT: Draft Bruneau - Kuna Grazing Environmental Impact Statement (EIS)

We provided comments on the subject EIS in a June 18 memorandum. Since that time we have made a more comprehensive review and wish to supplement our earlier statement with the following comments.

General Comments

- 2.1 The draft EIS appears to be attempting to justify the proposed action without having clearly described the need for it, particularly the implied need to increase livestock use on apparently overused range. The document also does not indicate an environmentally preferred alternative. Finally, the statement tends to minimize many important adverse effects of the proposed action on wildlife resources.

Specific Comments

- 2.3 Page 1-1. This chapter should include a statement of the need to which the agency is responding. The need to restore and rehabilitate resources damaged by livestock grazing is apparent, but it should be described. The implied need to increase livestock use is neither described nor apparent.

Page 2-10, 3rd paragraph. The Fish and Wildlife Service is seriously concerned about the proposed Jacks Creek pipeline because of the unacceptable adverse effects upon bighorn sheep described on page 4-7. We respectfully request BLM reconsider the environmental soundness of this proposal in view of its responsibilities under its Organic Act and the National Environmental Policy Act.

Page 2-18, Alternative #4. We prefer this alternative because it would provide a more even balance between economic development and environmental protection. As shown in Table 2-12, Alternative #4 provides increased benefits to livestock interests over the long run and improves conditions for the natural resources (e.g., wildlife) as well. Of the alternatives considered, this should be ranked as the environmentally preferred alternative.

Page 3-1 through 3-20. This chapter describes most of the resources (e.g., vegetation, soil, terrestrial wildlife habitat, and fisheries) as being in poor or only fair condition. In many, if not all, cases livestock use or overuse is the major cause of the degraded condition. Such a situation seems to indicate a reduction in livestock use rather than an increase as a solution to the problem.

22.4

Pages 4-5 and 4-6, Mule Deer. The discussion minimizes adverse effects. It should describe the continuing environmental impacts of livestock grazing on deer winter ranges in the fall and early winter and of the competition for grasses and forbs in spring. The loss of protective cover from range treatment of tall stands of sagebrush should be mentioned. Also, the section should discuss the effects of increased livestock use, particularly in areas of previous non-use.

22.5

Page 4-6, Antelope. This section is also misleading. Adverse effects outweigh the so-called benefits of the proposed action and could cause the current population to decrease.

22.6

Page 4-7, Bighorn Sheep. The first sentence of this section lacks support or substantiation. The section discusses only adverse effects on bighorns; therefore, the proposed action could only be described as generally detrimental to them.

22.7

Page 4-8, Sage Grouse. The minimal improvements and minor benefits described would not outweigh the adverse effects of increased livestock use and early grazing in nesting and brood rearing habitat. Population levels could decrease.

Summary Comments

The Fish and Wildlife Service believes the draft EIS is inadequate, i.e., values and needs of wildlife did not appear to be given equal consideration in comparison to the questionable economic value. For example, the development of the Jacks Creek pipeline and the maintenance and growth of the bighorn sheep population are incompatible objectives. To sacrifice the sheep for the pipeline is an environmentally unacceptable tradeoff. We ask that BLM consider preparing and circulating for review a revised draft EIS. We also recommend that the Idaho Department of Fish and Game be invited to fully participate in the revision process because of the significant potential impacts on resident wildlife species. If this document is not revised, we recommend you select Alternative #4 - Reduced Livestock Grazing as the most balanced and best long range solution to the problems.

We appreciate the opportunity to review and comment on this document.

L. A. Mehrtzoff
L. A. Mehrtzoff

cc: RO, FWS, Portland
(ARO-E)
SE, Boise
IOFG, Hdqtrs, Boise
IOFG, Region 3, Boise
IOFG, Region 4, Jerome
FWS, OEC, Washington, D.C.
RED, D.O.I., Portland

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Response to Letter No. 22

- 22.1 Chapter 1, Purpose and Need, has been revised to further explain the relationship between the proposed action and the resource area's land use plans. This should clarify the purpose and need of the proposed action. See text change section.
- 22.2 As required by the Council on Environmental Quality's regulations for implementing NEPA, section 1505.2(b), the environmentally preferred alternative will be identified when the record of decision is prepared.
- 22.3 See Response No. 21.2.
- 22.4 Environmental impacts of livestock on deer winter ranges in the fall and early winter are not expected to be a problem. On page 2-9 (Measures to Improve Mule Deer Habitat) utilization of key winter shrubs is described. "Grazing systems would recognize the physiological requirements of key forbs and shrubs needed by mule deer." On mule deer winter ranges, utilization of all shrubs will be limited to 50%. In addition only 30% of such utilization will be allowed for livestock. Proper utilization of key forage plants should provide the grasses and forbs needed in the spring mule deer diet.

The loss of protective cover from range treatment of tall stands of sagebrush should not have a negative affect on mule deer. On page 2-9 measures are described to prevent the loss of hiding and thermal cover. All treatments would be designed to maintain a ratio of 60% forage to 40% cover. In addition, no treatment would exceed one-fourth mile in width. The manipulation of big sagebrush in poor condition would improve plant composition and produce edge effect.

Increased livestock use in areas of previous non-use is not expected to impact mule deer. According to the vegetation predictions these areas would not decline in condition. We do recognize that concentrations of livestock around new water sources will cause localized vegetation depletion but we felt the negative impacts associated with this to mule deer would be balanced by the addition of water in unwatered areas.

- 22.5 The Draft EIS predicted the antelope population to remain static due to the lack of significant improvement on the key winter/spring range. A decline in condition was not predicted which would have definitely led to an adverse predicted impact on antelope. As a result of comments received, the antelope winter/spring ranges will become a key management area. This is included in the measures to improve antelope habitat section of the revised proposed action. Based on these measures, antelope populations are expected to increase.

- 22.6 In the draft EIS, the proposed action was described as beneficial to bighorns contingent on improvement of the Battle Creek habitat. In consultation with the Idaho Department of Fish and Game, we have designated Battle Creek as a key management area. Within this area, priority will be given to improving rangeland condition adjacent to Battle Creek to reduce livestock conflicts with bighorn sheep. See measures to improve bighorn habitat in the revised proposed action. The Battle Creek, Big Springs and Riddle Allotments are also identified in the top four priorities for monitoring and AMP development.
- 22.7 Sage grouse populations in the Draft EIS were expected to remain at current low levels. Benefits to sage grouse were assessed to balance with negative impacts of the proposed action.

Increased livestock use was not expected to impact sage grouse due to the two following vegetation predictions on which habitat assessment were made. First, habitat in good condition and not previously grazed, would be maintained in good condition. Second, thousands of acres currently in poor and fair ecological condition are predicted to improve one condition class. We did recognize that livestock would continue to concentrate in key sage grouse habitats (i.e. meadows and streamside riparian areas). This negative impact was expected to be balanced by improvement in the uplands.

Because of the concentrations of livestock on important sage grouse meadow and brood rearing areas and the competition for forage during the early spring months, the measures to improve sage grouse habitat in the proposed action have been expanded. Grazing systems which provide rest or deferment through the critical brood rearing period and fencing of large meadow complexes would be provided. This would allow sage grouse populations to increase.

July 15, 1982

Martin J. Zimmer
District Manager
Bureau of Land Management
Boise District Office
3948 Development Avenue
Boise, Idaho 83705

RE: BRUNEAU-KUNA GRAZING EIS

Dear Mr. Zimmer:

The Board of Ada County Commissioners wishes to express their support for Alternative # 4 (Reduced Livestock Use) as outlined within the Draft BLM Bruneau-Kuna Grazing EIS. Although this alternative is not significantly different from the proposed action by BLM as it relates to the Ada County portion of the study area, the alternative would provide considerable additional benefits to the overall resource base for the entire study area in the long term. Alternative # 4 would also be more consistent with current and past Ada County positions, policies and recommendations made to BLM on public lands management within the County regarding the protection and enhancement of the Snake River Birds of Prey Natural Area and its associated environs.

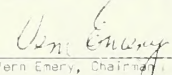
As established under the Ada County Concept Plan (1974) and as generally reflected in the Ada County Comprehensive Plan (1977 and 1982) the southern fringes of Ada County near and adjacent to the Snake River, particularly the Snake River Birds of Prey Natural Area, are considered unique locally and nationally. Many experts consider the area unique world-wide for its wildlife and total ecosystem. Congress and our executive branch have established protective laws and plans to manage the area and its resources for the benefit of future as well as current generations. Although the minor reduction of current levels of livestock grazing suggested by BLM in their proposed action will have a larger impact upon the total area and particularly the Ohwyee Resource Area, the Ada County Board of Commissioners believes that Alternative # 4 would be more consistent with adopted plans in this county and in keeping with our citizen's expressed concerns about the management of public lands in the area.


As pointed out within the EIS, current wildlife and other natural resource conditions are in generally poor condition due to over-grazing. Management practices by BLM and the livestock users of these lands have not applied what can be truly considered multiple use concepts, even though past management plans may have been considered adequate by the general public and agencies responsible. The fact remains the area is in need of considerable improvement through needed

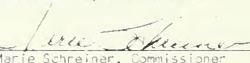
BLM actions for tighter grazing allocations, management and AUM (Animal Unit Month) enforcement on livestock. This could be done through Alternative # 4 and would be highly beneficial to wildlife, water quality, riparian vegetation, fisheries habitat, wilderness characteristics and public recreation in the area, without any significant long term impacts to the region's economy.

As the objective of the EIS is to study alternatives and develop recommendations to help establish and apply an improved rangeland management program on approximately 2.4 million acres of public land, the Ada County Board of Commissioners believes it would be in the best interest of the public to maintain previous positions and policies by encouraging BLM to apply Alternative # 4 through their administrative action.

BOARD OF ADA COUNTY COMMISSIONERS


Vern Emery, Chairman


Bill Gratton, Commissioner


Marie Schreiner, Commissioner



July 16, 1982

Mr. Martin Zimmer
Bureau of Land Management
3948 Development Avenue
Boise, ID 83705

Re: Bruneau-Kuna Grazing EIS

Dear Mr. Zimmer:

In our review of the subject draft EIS, we have determined that the Proposed Action Alternative will create serious impacts to segments of the wildlife resources. We therefore wish to provide the following comments related to these concerns, as well as the contents of the document.

General Comments

It is our opinion that the document lacks sufficient detail to allow a multiple-use decision. The document does not contain data regarding proposed grazing system by allotment, range readiness dates by pasture, allocation of forage by individual pasture, estimates of wildlife demands by pasture for the present and the future or a comparison of the number of competitive AUM's allocated to livestock and wildlife. We do not believe a realistic evaluation of the effects of the various alternatives can be made without these data.

The environmental consequences section does not adequately describe the adverse environmental effects of the proposed action.

We were unable to determine whether any of the alternatives could be considered the environmentally-preferred alternative, nor did we find any discussion as to why mitigating measures were not proposed to solve some of the recognized environmental problems. We believe both items are required by regulations for implementing the procedural provisions of the National Environmental Policy Act (Sec. 1505, 2(b)(c)).

Mr. Martin Zimmer
July 16, 1982
Page 2

Section 1502.6 of the regulations (Interdisciplinary Preparation) also requires that an interdisciplinary approach will be used to insure the integrated use of natural and social sciences. The list of preparers of this document indicates that the team was made up of an excellent cross section of backgrounds, especially in the field of fish and wildlife resources. However, because of the lack of consideration given to fish and wildlife, we wonder whether your biologists were involved in an interdisciplinary review process during the preparation of the draft, or were afforded only the opportunity to provide data but not analyze the impacts.

We are strongly opposed to the Jacks Creek pipeline. With the initial monetary investment of the well and pipeline, we believe efforts will eventually be made to build the lateral pipelines which will ultimately lead to the loss of a large segment of the Jacks Creek California bighorn sheep population.

Based on the alternatives presented, the Department recommends that Alternative #4 (Reduced Livestock Use) be selected rather than the Proposed Action. We consider it to be the only alternative displayed that would provide this Department with the opportunity to meet future demands that will be placed on fish and wildlife resources, by enabling us to better achieve our 1985 and 1990 management objectives.

We further offer the following recommendations that, we believe, will help improve the adequacy of this document as well as provide assistance to the deciding administrator in making an informed decision.

- Add the following data:
 - A proposed grazing system by allotment.
 - Range readiness dates by pasture compared to proposed turn-out dates.
 - Allocation of forage by pasture.
 - Estimates of wildlife demands by pasture for the present and future.
 - Comparison of competitive AUM's allotted to wildlife and livestock by pasture.

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- 24.3 | 2. Reevaluate, clarify and mitigate the effects of the proposed action on mule deer, bighorns, pronghorns and sage grouse.
- 24.4 | 3. List wildlife losses and losses of consumptive and non-consumptive uses of wildlife as irretrievable losses.
- 24.5 | 4. Discuss the pros and cons of changing the turn-out dates for livestock in areas where range readiness or wildlife needs dictate the desirability of this action.
- 24.6 | 5. Include realistic mitigation measures designed to solve some of the recognized adverse environmental effects of the proposed action.
- 24.7 | 6. Clarify how the proposed action affects the Idaho Department of Fish and Game goals and objectives for fish and wildlife resources in this area.
- 24.8 | 7. Discuss what tradeoffs will occur if funds to cover monitoring programs are not allocated.
- 24.9 | 8. Correct contradictions in the document such as stipulation of measures to protect resources that pertain to maintaining a separation of use between livestock and bighorn sheep on page 2-9, and the environmental consequences that will occur to bighorn sheep as a result of increased livestock use as described on page 4-7.

Specific Comments

Summary

Proposed Action, Page i, paragraph 1. Reference is made to maintaining "reasonable" wildlife numbers, rather than working toward increasing population levels to meet future public demands. An allocation for wildlife of only 1% of the total AUM's has to be considered inadequate. Is this "reasonable" allocation of resources a figure to be used for planning purposes, or for the users of this resource?

- 24.10 |

Environmental Consequences

- 24.11 | Proposed Action, Page iii, paragraph 3. This paragraph does not properly display the environmental consequences that will occur to wildlife resources. It has been written to display questionable benefits rather than impacts. How is mule deer diet going to improve? With over 10% of the total area proposed for land treatment projects designed to remove shrubs and replace them with grass, plus the fact that the location of many of these treatment projects are proposed in areas designated as "Critical Mule Deer Winter Range" (map 3-4), we can anticipate nothing but negative effects on these ranges. As displayed in Table 3-1, optimum winter diet is comprised of 80% shrubs. How is this segment of annual forage needs going to be improved?
- 24.12 | With additional removal of shrubs on antelope ranges, we cannot determine how antelope populations can remain at current levels.
- 24.13 | To describe that the proposed action is going to be beneficial to bighorn sheep is totally in error. The proposed action does not comply with the stipulation described on page 2-9 that there will be a separation of use between livestock and bighorns. On page 4-7 it is stated that bighorn sheep will be displaced (to where?) by the Jacks Creek pipeline; also it has not been determined where any livestock reductions will occur along the west side of Battle Creek. Proposed land treatment projects, water developments and fencing for increased livestock use and failures to improve the existing deteriorated range along Battle Creek indicates the "entire population (estimated to be 65 animals) may be lost." What improvements for bighorn sheep are going to be provided that will more than offset these potential losses?
- 24.14 | Here, again, how can sage grouse populations remain unchanged with the vast amount of land treatment projects proposed on sagegrouse winter ranges as designated on map 2-2? The removal of sagebrush will not only affect food availability in the winter, but will also affect nesting cover in the spring. No major effort is being exerted to protect essential wet meadows from increased livestock use. If livestock numbers are increased at the level proposed, these critical brood areas will eventually be lost.

CHAPTER 1. Purpose and Need

The Jacks Creek Pipeline, Page 1-1, item 2. Reference is made to "examining various levels of the development of this pipeline." We cannot find where these various levels are described except under the proposed action where 19 miles of pipeline are to be constructed, and under Alternative 3 (Increased Livestock Use) where it is proposed that an additional 22 miles of lateral lines would be added to the 19 miles of new pipeline. Are these the only two levels of development? What about the water source for this pipeline? Where will it be developed and who will have the water right? Will there be any impacts created by the development of this water source and construction of the pipeline? On map 2-5 a well is shown in Section 9, T10S, R2E. Is this the primary water source for the pipeline and has it already been developed? If it has been developed, is it presently being used as a water source for other water development projects?

- 4.15 |
- 4.16 |

CHAPTER 2. Description of the Proposed Action.

Vegetative Allocation

Page 2-2, paragraph 2. Of the 202,275 AUM's being allocated for livestock, how many are classed as competitive livestock AUM's? Even though the 2,333 AUM's allocated for wildlife are classed as competitive, we cannot determine from the document whether the remaining allocations for livestock are similarly classed.

- 24.17 |

Page 2-4, Table 2-2. Based on the figures shown, no additional allocation beyond the 2,333 AUM's initially provided will be made for wildlife on ranges classed as suitable. Statements in the document relate to management plans, range improvements, water developments, etc., as being beneficial to both livestock and wildlife (pages 2-10 and 2-11). This has to be accomplished in areas classed as suitable, and yet no increased allocations are provided for wildlife. We therefore are left to believe there is no provision or intent to increase wildlife numbers except in areas classed as unsuitable for livestock. This is further substantiated in items 6, 7, 8 and 9, where it relates to providing only "adequate" or "sufficient" habitat for bighorn sheep, mule deer and antelope. Only in the case of fish habitat do we find specific intentions to improve habitat conditions for fish and wildlife resources.

- 4.18 |

Page 2-3, Table 2-1. The next-to-last column describes existing and proposed seasons of use periods for grazing on each allotment. None of these dates are being adjusted despite the fact that many of them, such as Unit 813, provide for livestock grazing during November and December on mule deer winter range. We do not understand how the stipulated measures to improve mule deer habitat as described on page 2-9 by limiting livestock use of shrubs to 30% can be accomplished by extending grazing periods through the months of November and December. We cannot support any program that provides for extensive livestock grazing on deer winter ranges later than August 31.

- 24.19 |

Page 2-8 and -9. Unless changes are made in the proposed document designed to reduce impacts on wildlife species such as bighorn sheep and mule deer, these statements should be deleted or amended. The statement regarding enhancement of bighorn sheep habitat (page 2-9, paragraph 1) is contradictory to the statement on page 4-7 that the proposed pipeline would result in noncompliance of this stipulation.

- 24.20 |
- 24.21 |

Under Measures to Improve Mule Deer Habitat, there should be a measure restricting the burning of bitterbrush and mountain mahogany, especially on wintering areas. Provisions to maintain stands of big sagebrush and mahogany in major mule deer areas for use as thermal cover and security should also be included. We find no reference in the document to the value these large shrubs contribute to the maintenance of deer populations.

- 24.22 |

Project Development and Land Treatments

Pages 2-9 through 2-15. The extent of range improvements under the proposed action is quite extensive. We find no mention in the document that relates to the BLM's new rangeland management policies and policies related to water rights for stock water. We are extremely concerned as to how and when these policies will be implemented and their potential impacts on wildlife resources.

- 24.23 |

According to the new policy on maintenance of range improvements, all structural improvements constructed or installed primarily for the benefit of livestock will be maintained by permittees/ lessees. In the case of water rights for stock waters, the permittee may file jointly with the BLM as co-holder of water rights or under a section four permit he alone will file for the water right. We feel such policies jeopardize the use and availability of these improvements by wildlife especially in situations where new water developments are installed, birds and animals are attracted to them during the grazing season, then the water is turned off when the livestock are removed from the pasture. What assurances can the BLM make that these water supplies will be available during the period that wildlife are dependent on them? The statement in the last sentence of paragraph 3 on page 2-12 is not specific enough to satisfy our concerns as to who will control the water in water developments and pipelines. Is the BLM presently providing water for wildlife at existing structures following the removal of livestock from the pasture?

Livestock Grazing Management

Page 2-10, paragraph 2. Reference is made here to the proposed 19 miles of new pipeline to be constructed between Little Jacks and Big Jacks creeks. The significance of this development and the potential impacts it is going to have on other resources should require that the background and construction details of the project be fully described. No reference is made to this pipeline on page 2-12 under Pipeline Development, which we assume would be the logical place for it.

The impacts this pipeline will have on bighorn sheep, visual resources and potential wilderness areas as described in Chapter 4 of the draft EIS establish it as a project requiring careful evaluation. Will a separate EIS or EAR be prepared for it prior to construction? In view of the impacts displayed, we are opposed to its construction, not only on the basis of the initial impact on bighorn sheep, but because of the potential development that can occur once it is in place. There are no guarantees that, in the future, laterals will not be built as proposed in Alternative 3 (Increased Livestock Use). In order to justify the costs of a pipeline of this length it appears only logical that, to provide an acceptable cost/benefit ratio, laterals will eventually have to be built.

CHAPTER 3. Description of the Affected Environment

Vegetation, Condition and Trend

Page 3-3, paragraph 6. It is recognized by the BLM that spring and early summer grazing by livestock is detrimental to palatable plants. If range improvements are going to occur, it would appear adjustments are going to have to be made to grazing use during this period. Why, then, is the BLM continuing this practice on resource areas to the extent that no changes are proposed on any allotment to delay the turn-out date? Rather than adjusting periods of spring and early summer use as a natural means of increasing forage for livestock use, it is proposing to extend livestock use into areas presently classified as nonuse by expending funds for fencing, water developments, and extensive range improvement projects that include spraying, chaining, burning, etc. Shouldn't a change in the turn-out dates be considered, along with other range management practices, not only as an effective way to improve plant density and vigor, but also as a cost-effective measure?

Terrestrial Wildlife

Mule Deer

Page 3-6, last sentence. See previous comments on page 2-3.

Bighorn Sheep

Page 3-8. The problem of existing conditions along Battle Creek for bighorn sheep is recognized, but no provisions are made to alleviate or improve the situation. The potential loss of an estimated 65 animals as stated on page 4-7 with no mitigative measures proposed to reduce impacts is indicative of a lack of concern on the part of the BLM for this important resource.

Sage Grouse

Page 3-10, paragraphs 2 and 3. The problem with water distribution and availability was previously discussed. However, where water supplies are inadequate as described here, the BLM should provide for an additional water source to supply these areas during mid- and late-summer months when it is critically needed. This situation was created by BLM and should, therefore, be rectified by BLM.

Fish Populations

Page 3-14, paragraph 2. To the best of our knowledge, no red band trout are found north of the Snake River and we are reasonably sure they are not present in Bennett Creek.

CHAPTER 4. Environmental Consequences

Vegetation

Page 4-2, paragraph 4. With an increase of 33% in livestock use in the resource area over the next 20 years, and with some areas being excluded from existing grazing, unprotected riparian vegetation is going to receive more intensive use than at existing use levels. Rather than stating "no significant improvement" the pertinent statement should read "resulting in a continued decline of riparian vegetation."

Terrestrial Wildlife

Mule Deer

Pages 4-5 and 4-6. This section attempts to describe benefits of the proposed action to wildlife resources rather than environmental consequences. No mention is made of the impacts of livestock grazing on winter ranges during fall and early winter. The loss of cover for thermal protection and security in tall sage areas proposed for treatment is not addressed. No concern is expressed over the interaction between livestock and mule deer in existing nonuse areas where livestock will be introduced through the range improvement proposals.

Antelope

Page 4-6. It is difficult for us to believe that, with all the actions that are going to be initiated on antelope ranges, it will be possible to sustain populations at present levels.

Bighorn Sheep

Page 4-7. How can the proposed action be considered as generally beneficial to bighorn sheep when, by the BLM's own analysis, 5-10 bighorns will be displaced in Rattlesnake Creek, a tributary to Little Jacks Creek, and an estimated 65 animals may potentially be lost in Battle Creek? This statement must be deleted! Nowhere do we find a firm proposal to improve any of the Battle Creek area for bighorn sheep, nor are any mitigative measures proposed.

Sage Grouse

Page 4-8. Here, again, detrimental impacts to sage grouse are downplayed. Even where serious impacts are described, such as in paragraph 7, they are summarized by stating "...population levels will remain at current levels." We cannot agree with this analysis.

Irreversible and Irrecoverable Commitments of Resources

Page 4-56. An explanation is in order as to why the previously described losses of wildlife resources resulting from the Proposed Action or one of the Alternatives were not included in this list. Certainly if livestock production can be included as an irretrievable loss, the losses of bighorn sheep, antelope, mule deer and sage grouse should receive equal consideration. We find this section to be inadequate and misleading as pertains to the effects the proposed action will have on the environment.

These comments have been quite extensive. Many of them could have been eliminated had there been closer coordination with our Department, especially in that category pertaining to analysis of impacts on fish and wildlife resources of the proposed action and alternatives. Our personnel are available to assist your staff and we encourage your use of their services when preparing the final EIS.

Thank you for the opportunity to comment on this document.

Sincerely,

Jeff M. Conley
Jeff M. Conley
Director

- 24.1 As provided by the Council on Environmental Quality's regulations for Implementing NEPA, section 1505.2(b), the environmentally preferred alternative will be identified when the record of decision is prepared. Mitigation measures which lessen some of the adverse impacts have been incorporated into the management constraint section of the revised proposed action.
- 24.2 (a) Proposed grazing systems for allotments 524, 584, 629 and 636 have been identified and are included in the revised description of the proposed action. Grazing systems are not known on the remainder of the allotments. They would be developed when allotment management plans are prepared.
- (b) Sufficient range readiness data is not available to establish these dates at this time.
- (c) The proposed forage allocation by allotment is a compilation of forage availability and use by pasture. Wildlife forage needs have therefore been satisfied on a pasture level basis. Standard Bureau procedure is to allocate forage by allotment, and not by pasture.
- (d) Estimates of present and future wildlife demands were made by pasture to arrive at the allotment level forage allocations. We do not feel that showing this demand for all pastures within the EIS's area would enhance the clarity of the EIS or aid in the analysis of impacts. Forage demands by pasture can be assessed where specific problems or impacts need to be identified or resolved.
- (e) As stated in (c) above, standard Bureau procedure is to allocate forage by allotment and not by pasture. Where necessary, forage use can be compared on a pasture level basis.
- 24.3 These points are addressed in the responses that follow.
- 24.4 The irretrievable losses of wildlife have been added to the section on irretrievable resources. See text change section.
- 24.5 As the proposal is implemented, turnout dates would be adjusted to correspond with range readiness dates for individual allotments. Range readiness dates would vary between allotments depending on the type and design of specific grazing systems, climatic differences, and resource needs.
- 24.6 Additional mitigation measures have been included in the wildlife constraints and coordinating measures described in the revised proposed action.

- 24.12 Any range treatment in antelope habitat will be constrained to conform to their habitat requirements. The constraint listed on pg. 2-9 is the main constraint to be applied. However, all the constraints and coordinating measures listed in the land use plan would be adhered to. The revised description of the proposed action reflects additional constraints.
- 24.13 The analysis of impacts to bighorn sheep have been modified and clarified. See text change section.
- 24.14 Detrimental impacts to sage grouse would be reduced by proper stocking rates, implementing grazing systems and proper utilization. Grazing systems would incorporate some degree of rest or deferment. Also see Response No. 22.7.
- 24.15 A third level of development, no construction, is assessed in Alternative 4.
- 24.16 The well for the pipeline, which is not presently being used, has already been constructed. The impacts of the associated pipeline are discussed throughout Chapter 4. The water rights for water developments are discussed in the revised description of the proposed action.
- 24.17 Sufficient forage is available to satisfy the wildlife allocation (2,332 AUMs) as well as the livestock allocation (202,275 AUMs).
- 24.18 It was an oversight that wildlife did not receive an additional allocation. The initial allocation is based on 1990 goals, but we failed to provide additional forage for the period 1990 to 2000. As per our discussions, the revised proposed action has provided for additional wildlife allocation.

It was not our intent to imply that we do not have specific objectives to improve wildlife habitat. A host of wildlife habitat improvement objectives were described in the land use plan (MPP Step 2). These objectives are incorporated into the EIS. Item 6, 7, 8 and 9 on pg. 2-2 are the general objectives for each species. These objectives contain many sub-parts which are more specific and deal with improvement of poor condition habitats and maintenance of presently good condition habitats. Nevertheless, because of the misinterpretation of these objectives, we have modified them in the Final EIS to reflect the improvement needs.

A table has been prepared to show the relationship between the proposed action and the land use plan objectives and recommendations.

- 24.19 The seasons of use cover entire allotments which are made of many pastures. Although livestock may be present on an allotment after August 31 it does not necessarily mean they would be present on a deer winter range.

- 24.7 BLM's wildlife objectives reflect the Idaho Department of Fish and Game goals and objectives for wildlife numbers in the area. A table has been prepared to assess the attainment of these objectives by the proposed action and alternatives. See revised description of the proposed action.

- 24.8 See response to Comment No. 21.17.

- 24.9 Implementation of the 19 mile portion of the Jacks Creek Pipeline would not conflict with the stipulation to maintain a separation of use between cattle and bighorns by not developing livestock water sources within bighorn habitat unless the potential adverse impacts to bighorn sheep can be avoided or mitigated. The proposed pipeline is approximately 1/2 to 3/4 mile outside of the current bighorn habitat. The statement that the proposed action does not comply with this stipulation has been deleted. See text change section.

- 24.10 "Reasonable" wildlife numbers is synonymous with the Idaho Department of Fish and Game 1990 goals for each ungulate inhabiting the EIS area. Forage allocation was based on these 1990 goals and it was made after plant needs were deducted but before livestock AUM's were allocated. Wildlife forage needs were based on the number of animals in a particular pasture, their season(s) of occupancy, their seasonal food habits, and their forage consumption rate. Forage demand for wildlife was taken from areas occupied by wildlife. For example, if a wintering mule deer herd occupied both a steep rugged canyon (unsuitable for livestock) and some rolling terrain (suitable for livestock), forage was provided from both areas. No attempt was made to consolidate the deer's need in the area where no forage was allocated to livestock.

One percent does not represent the forage demand by wildlife. It represents their demand for grass. In the allocation process, grass always was the limiting forage class because of the heavy preference for grass by cattle. Because of the confusion surrounding this process, an example is provided in the revised proposed action.

- 24.11 This paragraph represents a summary of impacts. The conclusions were based on:

- 1) Predicted improvement in poor and fair condition rangelands (present - 73% poor and fair; proposed - 59% poor and fair).
- 2) No decline in rangelands presently in good condition.
- 3) The habitat needs of key wildlife species would be incorporated into any range treatment (see pp. 2-8, 2-9, 2-12 and 2-13).
- 4) Livestock grazing systems would be implemented.
- 5) Seasons of use would be adjusted to meet plant needs.

Our experience indicates that cattle can make heavy use of shrubs starting in July and if the stocking rate is heavy they can overuse shrubs by mid-August. Therefore, rather than limiting season of use, we feel it is better to limit livestock utilization of palatable shrubs to within prescribed limits.

The next to the last column on Table 2-1 indicates existing seasons of use. As the proposal is implemented, the season-of-use dates would be adjusted to satisfy plant maintenance requirements or other resource needs as appropriate. Normally, the proposed season-of-use would fall within the range of the described existing seasons-of-use. See the revised description of the proposed action.

- 24.20 These are constraints to grazing management and project development that are designed to protect or enhance other resource values.

- 24.21 See Response 24.9.

- 24.22 These measures have been added to the revised description of the proposed action. The importance of large shrubs to the maintenance of deer populations is recognized. That is one of the reasons for providing forage to cover ratios and other constraints described in the proposed action.

- 24.23 See Response No. 21.20 and 21.21.

- 24.24 Sufficient water would be filed upon by the BLM to satisfy anticipated wildlife needs. We intend to provide water to satisfy wildlife who become dependent on new pipeline developments. This is a current practice on most of the existing pipeline developments.

- 24.25 A description of the pipeline is included in the revised description of the proposed action.

- 24.26 A site specific assessment will be made on the pipeline prior to its construction. If impacts are identified that have not been adequately addressed in this EIS, a separate EIS will be prepared.

- 24.27 See Response 21.19. The alternative of later turnout dates is considered in Alternative 4.

- 24.28 Improvement of the vegetative resource and improvement of bighorn sheep habitat will be established as the 1st primary management objective for the Battle Creek bighorn sheep habitat area. See revised description of the proposed action.

- 24.29 The Ant Hill pipeline system remains charged with water throughout the summer. The statement on page 3-10 is in error and has been deleted.

July 15, 1982

- 24.30 Morphologically we've detected no great difference in native rainbow trout north and south of the Snake River. Initial investigations (pyloric caeca counts, vertebrae counts and surface markings) of native trout in streams north of the Snake River are similar to those south of the Snake River that have been identified by researchers (Behuke - Wallace) as native trout called "red band". We have no reason to believe that red-bands are not present north of the Snake River.
- 24.31 The Proposed Action calls for development of grazing system on intensive management allotments, thus unprotected riparian areas will receive periodic rest from livestock grazing. We feel this periodic rest, stocking at the proper level and development of additional range improvements would at least maintain the present condition of unprotected riparian vegetation.
- 24.32 Mitigation was incorporated into the proposed action. As a result, adverse impacts were alleviated. The addition of livestock into presently ungrazed areas was not considered to have a significant impact because no change in vegetation condition was predicted.
- 24.33 See Response 24.12.
- 24.34 See Response 24.13.
- 24.35 See Response 24.14.
- 24.36 We feel that we have coordinated closely with your regional staff throughout the land use planning process.

During the inventory phase (1979, 1980) we provided substantial flight time and flew with your biologists to improve wildlife distribution and population data bases. Our biologists worked together to establish the population goals which our forage allocation is based upon. When your regional personnel changed, we initiated a meeting to brief them on the status of the land use plan and other matters affecting fish and wildlife resources. Comments were solicited from your regional staff on the preliminary land use plan. The proposed action in the grazing EIS is based upon that preliminary land use plan.

Specific mention is made to the lack of coordination in assessing impacts. We hope you can appreciate that we operated under an extremely short time frame between the end of our comment period on the land use plan and when the Draft EIS had to be to the printer. With the prior coordination we did not expect that the impact assessment would come as so much of a surprise. We also feel that a draft provides a forum for comment and coordination. We are sensitive to the need for close coordination between personnel of both agencies. Although our mandates are not totally similar, we would like to build on those that are similar.

Bureau of Land Management
Bruneau-Kuna Grazing EIS
Boise District Office
3948 Development Avenue
Boise, Idaho 83705

Sirs:

We would like the following statement to go on record in reference to the Bruneau-Kuna Grazing Environmental Impact Statement Draft:

We as ranchers brought together under the Owyhee Cattlemen's Association are greatly concerned about the effects that the implementation of either the BLM's Proposed Action or any of the Bureau's four Alternative Proposals might have on the members of our association and on Owyhee County.

It has long been the position of our organization that the multiple-use management concept best serves the public lands and the counties and states (such as ours) that are comprised primarily of these federally-owned lands. It is also our contention that domestic livestock is the single most effective range management tool available to those who are charged with managing the range resources. Our opposition to the establishment of wilderness areas in Owyhee county and the resultant lack of management flexibility is also a matter of record.

We hear a great deal about ecosystems and how each living organism has its "niche" in the ecological system. We must remember that humans also have a "niche" - not only in ecological systems, but also in economic systems.

The economic importance of the range livestock industry to Owyhee County and the State of Idaho is easily documented in terms of dollar value. It is not easily documented what the domino effect would be on the local, county, and state economies if livestock use of the federal rangelands in this area were to be curtailed to any degree. There is no question in our minds that the effect of a curtailment would be severe, not only on the individual producers impacted directly, but also on the enterprises that these producers rely on as sources of needed goods and services. It may be argued that businesses would survive, and the tax base may survive, but there is no question that the majority would suffer in the end. The EIS does not fully address the economic impact that some of the environmental statements' proposals would cause. Owyhee County's livestock

page 2

industry can turn grass into dollars for our national, state, and county economies and at the same time, as has already been proven, increase wildlife and maintain existing multiple-use values. Multiple-use management of this area can do all this without great costs to an already burdened government.

The Owyhee Cattlemen's Association believes that livestock grazing in Owyhee County must be, not maintained, but optimized to benefit the multiple uses of the range resources.

If there are areas lacking in productivity due to heavy grazing, then an effort should be made where ever possible to disperse the livestock and wildlife over a broader area by making needed range improvements in the form of water developments, spraying, etc. We feel that the wildlife has been and will continue to be compatible with the livestock in this area under proper management, and that range improvements will benefit all involved.

These are but a few reasons why the Owyhee Cattlemen's Association wishes to endorse Alternative #5. We urge that this Alternative #5 as described by ranchers in this area during testimony become the proposed action in the final EIS and be implemented when all is said and done.

Sincerely,

Gene Tindall
Gene Tindall, President
Owyhee Cattlemen's Association

26.1



STATE OF IDAHO
OFFICE OF THE ATTORNEY GENERAL
BOISE 83720

DAVID H. LEROY
ATTORNEY GENERAL

TELEPHONE
(208) 334-2400

July 16, 1982

Mr. Martin J. Zimmer
District Manager
Bureau of Land Management
Bruneau-Kuna Grazing EIS
3948 Development Ave.
Boise, ID 83705

Dear Joe:

In reviewing the draft EIS, we have the following brief, but we believe important, comments.

We have been concerned in the past about reviewing BLM decisions and the bases for them. We further believe that the law requires an EIS prepared in such a manner that the public can review the bases for the BLM's proposed decision so that it may comment meaningfully on the action. With those principles in mind, it appears to us that the proposed EIS does not adequately reveal the Bureau's bases for recommending certain areas as either suitable or unsuitable for wilderness and for recommending construction of the pipeline between Big and Little Jacks Creeks.

We find almost no discussion of the two measures in the document and feel that it would be difficult for anyone to review properly the proposed measures. We assume that the BLM did in fact make the analyses required to support its proposed decision and would presume no reason for its failing to disclose those analyses when failure to do so could lead to litigation by affected interests which could hamper the Bureau's freedom to implement the measures recommended.

We note that in the draft EIS you state that wilderness proposals "will be evaluated in a wilderness EIS scheduled to commence in October, 1982." From your statements in the draft EIS, however, one certainly could get the impression that the BLM has already arrived at a position on this issue

and will be taking management actions based upon it. It would further seem that if the October decision differs from the one reported in the draft EIS, that the draft EIS would have to be redone. Finally, if the October study is either postponed or not done, the present EIS could well become an operative document and the public again would have been deprived of its opportunity to comment on the BLM's action.

For all the above reasons, we would request that the Bureau elaborate on the impacts and rationales for the proposed pipeline and wilderness recommendations.

Sincerely,

DON A. OLOWINSKI
Deputy Attorney General
Chief, Natural Resources Division

26.1 The description of the proposed action has been expanded to provide the rationale and background for the proposed pipeline. Preliminary wilderness suitability recommendations are included within this grazing EIS because of the constraints that wilderness would place on proposed livestock grazing programs. The rationale and basis for the wilderness recommendations will be addressed in detail in the Wilderness EIS. Until wilderness study areas are released from wilderness review, they will be managed according to the Wilderness Interim Management Policy.

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Bruneau-Kuna Grazing EIS
July 19, 1982
Page 2

well as to improve the productivity of the rangeland for all resources including wildlife as required by the Public Rangelands Improvement Act(PRIA). Furthermore, we have expected the BLM to comply with the requirements of the National Environmental Policy Act(NEPA) and other applicable statutes in accomplishing this task. Our organization believes that adequate range EIS's are fundamental to and provide the primary means by which management actions necessary to comply with these laws can be identified, implemented, and supported.

The draft EIS does not meet this test and does not warrant our support. What we find is a document that is vague and misleading in addressing resource management in the Bruneau-Kuna Planning Unit. There are frequent generalities, technical quotations and assumptions. It lacks clearly defined alternatives and the reader is left wondering and searching for proposed management actions.

There is no background or rationale for the proposed action. Major objectives(p 1-1) does not contain necessary and relevant information about the land use plans. If the draft EIS is based upon the land use plan multiple use objectives, then the draft EIS appears flawed. There is no evidence of interdisciplinary team recommendations. Data and explanation for decision criteria appears to be insufficient. Additionally, the document does not explain the bias to accommodate livestock grazing, specifically:

- 1) Why the decision was made to increase livestock grazing despite the draft's admission(Chap 3, 3-3) that 73% of the range is currently in poor and fair condition.
- 2) that 82% is in a downward trend or static.
- 3) wildlife habitat for antelope, deer and sage-grouse, etc. is rated as poor and fair ecological condition.

27.1

27.2

District 3, Idaho Wildlife Federation(IWF)
700 E. Fairview Ave. #68
Meridian, Idaho 83642
July 19, 1982

Bureau of Land Management
Bruneau-Kuna Grazing EIS
Boise District Office
3948 Development Avenue
Boise, Idaho 83705

Dear Mr. Zimmer:

As noted in my comments at the Public Hearing(Boise, Idaho, July 1, 1982)relative to the Bruneau-Kuna Grazing EIS, further written comment would be submitted concerning our (District 3, IWF)appraisal and evaluation of subject document. Accordingly, the following comments are made for consideration in drafting the Final Bruneau-Kuna Grazing Environmental Impact Statement.

As you already know District 3, IWF is a conservation membership organization that has long been concerned about the management and current conditions of the public rangelands in Idaho and specifically the Boise District. We have urged and supported Bureau of Land Management(BLM) efforts to manage livestock grazing on these lands according to the multiple use and stewardship principles stipulated by the Federal Land Management Policy and Management Act(FLPMA) as

- 27.2 4) the decision to make a special effort to develop water sources within the first five years to utilize and/or make "unusable" forage in areas not currently grazed by domestic livestock.
- 27.3 5) the decision to construct the Little Jacks/Big Jacks Creek pipeline into an area having significant wildlife values. An action which would jeopardize the existing California bighorn sheep which were re-introduced within recent times.
- 27.4 6) the inane forage allocation to wildlife regardless of the projected forage production levels.
- 27.5 7) the numerous project developments and land treatment proposals (pp 2-9 and 2-10) have no site specific location, justification, or assessment of impact(s) upon wildlife, watershed or other public values beyond a general claim of "to achieve better distribution of livestock, increase forage production, improve watershed condition, and improve the condition of areas for wildlife."
- 27.6 8) an economic analysis that enumerates ranch budgets but ignores all other considerations of any economic value(s) of the public lands and those public dependent upon or benefiting from such values of the public rangelands.
- 27.7 9) no assessment or discussion of the impact(s) of the Bureau's change in water rights filing or the impact of increased maintenance responsibility by the livestock operator(s) for range improvements, especially developments having multiple use benefits, i.e. wildlife.
- 27.8 After reviewing the proposed action and its consequences, it is evident certain conflicts between wildlife and livestock exist, but they are not resolved. Problems relative to competition for spring forage when it is critical to mule deer for fawn survival, sage grouse for nesting and brood rearing have been left unanswered even though late turnout dates are recognized as beneficial and necessary to reduce conflicts. The problems of cover removal necessary to protect wildlife from natural predators has been omitted,
- 27.9

i.e. vegetation removal adjacent to water sources especially useful to small species of wildlife for protection. Protection of meadow areas is recognized but no action present or future is addressed. Are the meadows to be a sacrificial lamb to livestock operators?

The California bighorn sheep is greatly impacted, but two courses of action, later turnout dates and reduced grazing are not adopted. Instead, grazing is increased at the expense of the bighorn sheep. We do not view the sacrifice of the bighorn sheep habitat in Battle Creek as an acceptable management action. Additionally, the threat imposed by the proposed Little Jacks/Big Jacks Creek pipeline only compounds the problem throughout the resource area. The potential bighorn habitat is threatened with elimination if the proposed action is adopted and we find that likely hood undesirable.

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A large number of developments and land treatments have been proposed (pp 2-9 and 2-10). Which of the developments represent projects already planned and undertaken as part of the environmental assessment process? Have the projects completed since the scoping process been deleted from the totals on pages 2-9 and 2-10? What are the cumulative effects of these projects on the resource? What is the proposed action to ensure wildlife has a year around supply of water available at the water developments? Where the livestock operator has maintenance responsibility for multiple use range improvements what assurance or safeguards is there that wildlife needs will be protected and met? On land treatments, what action, if any, will be taken to prevent spraying or burning of bitterbrush and mountain mahogany? Who will conduct, supervise, or monitor spraying to prevent spraying in riparian areas such as occurred on the West Fork, Shoofly Creek? The foregoing items as presented in the draft

EIS are not fully or adequately addressed.

- 27.17 We participated in the planning process from the scoping process to the present. There is little in the draft EIS that reflects the concerns or issues raised by organizations or individuals sharing our views and for which they are on record. The livestock bias is evident. There are no real alternatives presented only variances to one theme--increased livestock grazing irrespective of resource conflicts and needs. The major game species such as antelope, California bighorn sheep, mule deer, and sage grouse are relegated to expediency (expediency). Developments, especially water projects, are again offered as a panacea for range management and wildlife. We are confronted with unacceptable losses in the bighorn sheep populations. Economic and social data on public land values other than ranching are excluded. Many other points relative to the inadequacy of this document would be too lengthy to enumerate so we have addressed what in our view are some of the most obvious deficiencies.
- 27.18

Considering the foregoing findings, questions and statements, District 3, Idaho Wildlife Federation requests you give equitable and prudent consideration to the shortcomings of the Bruneau-Kuna Draft EIS. We hope that our findings and comments will help in producing a final document that treats all public interests fairly and equally, one that will also meet the needs of the basic resource--the land.

Cordially,

Russell W. Heughins
Russell W. Heughins
Natural Resources Committee

- 27.1 See Response No. 21.1.
- 27.2 See Response No. 21.4.
- 27.3 See Response No. 21.5.
- 27.4 See Response No. 21.6.
- 27.5 See Response No. 21.10a.
- 27.6 See Response No. 21.10.
- 27.7 No impacts were identified relating to the Bureau's water or maintenance policies. Provisions would be provided to meet wildlife and other multiple use needs.
- 27.8 Although competition for forage would occur on mule deer spring range, we do not feel that this would limit mule deer diets to a point that populations would not expand. Improvement in range condition would allow populations to meet Idaho Department of Fish and Game 1990 population goals. See Response No. 22.7 regarding sage grouse.
- 27.9 Wildlife constraints and coordinating measures described in the proposed action would provide adequate cover to meet all wildlife cover requirements.
- 27.10 See Response No. 22.6.
- 27.11 See Response No. 2.2.
- 27.12 As part of the Bureau's on going range management program, a certain number of water developments and fencing projects are completed each year. The purpose of these projects is to improve range condition through improvement of livestock utilization patterns. These projects have not been deleted from the proposed projected development tables because these tables are estimates of total project needs and do not represent the precise number of project developments planned. Impacts of on going projects are assessed through the environmental assessment process.
- 27.13 The cumulative impacts that would result from the proposed project developments have been documented throughout the individual resource sections in the Environmental Consequences Chapter.
- 27.14 The design criteria for water developments in the proposed action includes measures to provide water for wildlife. Close coordination and supervision would be necessary to ensure that these measures are carried out.

- 27.15 A stipulation has been added to land treatment design criteria to restrict the burning of important bitterbrush or mahogany stands.
- 27.16 Either contract supervisors or project inspectors would closely monitor spraying projects to ensure that these projects comply with the required stipulations.
- 27.17 See Response No. 37.3.
- 27.18 See Response No. 21.19.

July 19, 1982

Bureau of Land Management
Bruneau-Kuna Grazing EIS
3948 Development Avenue
Boise, Idaho 83705

Re: Written Statement

In my testimony I referred to page 4-15 of the EIS. Your discussion of vegetation allocation at that point is at least confusing and certainly not well reasoned. Under the proposed action, 43,500 of 48,000 acres in good ecological condition located in proposed wilderness areas would be subject to increased grazing. Beyond admitting that the condition of areas adjacent to water sources would drop, your report notes that this increased use could have other serious, but unknown environmental impacts. In addition, your report states that the dynamics of the environmental system are poorly understood.

28.1 Considering that very little land in the Boise District is still in good ecological condition, it does not seem appropriate for you to take action that will very possibly destroy the last land in that state. No rationale for reducing land in good condition is given. Also, I would assume that part of the overall improvement in the grazing condition of the land covered by the EIS is accomplished by reducing good condition areas to a lower common condition across the whole Boise District. Your report does not explain how this feature of the EIS is calculated.

28.2 Because your EIS would adversely impact wilderness by reducing ecological condition (your report does not support any other conclusion) I am not able to support the Proposed Action. One of the values of wilderness is scientific. The naturalness and good condition of at least some land is important for future land-use decisions. Finally eliminating the last vestiges of land in good condition would tend to hinder objective planning in the future. How would management know what was good or bad if nothing in a natural state exists for comparison? The small land area remaining in good

ecological condition under the EIS proposal that would be saved in wilderness areas is not enough to be sure some areas in good condition would survive natural threats, such as fire, or management and human-caused errors.

28.3 Another area of your EIS where rationale is missing appears at page 2-24. A long list of benefits stemming from a later turnout date is given which certainly would benefit the condition of the land and wildlife. However, the idea is dismissed apparently because it is inconvenient for the livestock industry. No weight is given at this point in your report to the fact that elsewhere the EIS states that the pressures for hunting and recreational uses will increase. Unfortunately, the analysis here as well as at other points in the EIS appears to favor only one use -- livestock grazing.

28.4 At page 3-18 there is a discussion of the economics of the situation. Reading your figures, 90% of the income in the affected area comes from non-livestock sources. Then the report states that permittee's income represents only 1% of the regional income. Considering the small percentage of regional income generated by these BLM land-users, it is remarkable that little discussion in the EIS is directed at developing other more beneficial uses of this public land. Repeatedly this EIS talks in terms of the feelings of the ranching community. Nothing is said about the larger numbers of persons who hunt, fish, hike, camp, photograph and otherwise use these lands. This imbalance in treatment of the public should be corrected.

28.6 Unfortunately the controversy about the Jack's Creek area and pipeline dominates most discussion of this report. Beyond objecting to the line on the basis of its probable costs to the public and wild sheep, an objection should be lodged on the basis of the fact it distracts from numerous other sections of this EIS. The pipeline should have its own EIS. Then other features of the proposed action would be studied, and facts such as the amount of soil degradation and stream bank erosion would receive the criticism they deserve. The proposal would decrease soil stability on about half of the public streams. Alternative #4 would show decreases on only 29%. It seems the proposal is sacrificing public lands for the use of a small group of individuals, or at least that is what the figures in the report suggest.

In conclusion, I object to your proposal but could support the reduced grazing alternative. I believe it would be wrong for the BLM to fail at putting the economic situation into better perspective. It is especially wrong for the EIS to fail to evaluate more thoroughly the impacts of the proposal on other public land users. If such an analysis were performed, it is likely the reduced grazing alternative would look more appealing.

Sincerely,

Theodore S. Weigold
Theodore S. Weigold
1005 Fort St.
Boise, Idaho 83702



Reply to: 1920

Date: July 15, 1982

- 28.1 The intent is not to reduce all rangeland to a common denominator but to bring it up to a good condition class. As noted in Appendix Tables B-5 and B-6, the acreage in good range condition would increase from 334,600 acres to 627,045 acres over a 20 year period. The proposed action does not propose any livestock use increases on 4,500 acres of the 48,000 acres in good range condition that are located within wilderness study areas. Any range developments within the 48,000 acres would be carefully evaluated through the environmental assessment process.
- 28.2 The range condition would be maintained or improved on all areas except those immediately adjacent to water. The scientific or ecological values, however, could be adversely affected by increased grazing use. Because of this, specific projects would be evaluated through the environmental assessment process to ensure they conform with the Wilderness Interim Management Policy.
- 28.3 As grazing systems or allotment management plans are implemented, turnout dates would be adjusted so that grazing use would not occur prior to the range readiness date determined for each specific allotment. This date would be established based on soil and watershed needs, plant maintenance requirements, wildlife needs and other resource values present.
- 28.4 Since this is an EIS on the grazing management program, other aspects of the Bureau's management plans are not included. Many other proposals regarding the use of the area for other resources are included in the Management Framework Plan.
- 28.5 This was not felt to be any significant impact to the social well being of the recreation users. There is felt to be ample opportunity for recreation use within and adjacent to the study areas. With the exception of hunting use, it was not felt that the proposal would affect the recreation use of the area. We have expanded the discussion of impacts relating to the economic value of the changes in hunting use in the text change section. Also, see Response No. 21.10 and 34.3.
- 28.6 The Jacks Creek Pipeline proposal and impacts are treated in more detail than some other elements because this was raised as an issue at the scoping meeting.
- 28.7 This impact on soil stability described in the Draft EIS would result if the level of AUMs proposed in the proposed action were implemented with only limited livestock rest or deferment built into grazing systems. If grazing systems are implemented that contain more rest or deferment, the adverse impacts would be lessened. A constraint has been added to the proposed action which stipulates that increases in livestock use would not be allowed if this increased use would adversely affect soil stability.

Ted Milesnick
Bureau of Land Management
Bruneau-Kuna Grazing EIS
Boise District Office
3948 Development Avenue
Boise, Idaho 83705

Dear Mr. Milesnick:

Thank you for the opportunity to respond to the Bruneau-Kuna Grazing EIS.

Our sole comment concerns the references to riparian area-fisheries management found on page iii in the summary, and on pages 2-6 and 2-7.

On page iii it is stated that 278 miles of streams have been identified for grazing exclusion or special habitat management. According to statements on pages 2-6 and 2-7, 125 miles will be reserved for wildlife, etc., and 153 miles might or might not include total exclusion.

29.1 Concerning this step, we feel more specificity should be entered into the document. Total exclusion usually involves fencing, and unless you are referring to very short gap fences, this becomes extremely expensive. An obligation for future annual maintenance is also incurred. This obligation may be burdensome in light of unknown budgets down the road. Exclusion by fencing should be a last resort and more specific location identification should be attempted.

In addition, the statement on page iii "The remainder of the riparian areas would remain in unsatisfactory condition," inserts a strongly negative attitude into your draft statement. Granted, landownership patterns may make management measures difficult, but time frames for improvement can be expanded, the possibility for consolidated management of intermingled lands is present, etc. We suggest the adoption of a more positive management concept.

Again, thank you for the opportunity to comment. We appreciate the effort that goes into one of these statements.

Sincerely,

B. J. Graves
B. J. GRAVES
Forest Supervisor



FS-6200-11b (7/81)

Response to Letter No. 29

- 29.1 The exact location of fences cannot be identified at this time. It is anticipated that grazing exclusion would occur on 107 of the 153 stream miles because these streams are located within narrow deep canyons. Exclusion would be accomplished by gap fencing access points along the canyon rims. Because natural barriers exist along these rims, only 50 miles of fence would be needed to exclude grazing use of these streams.

7440 Manorwood Drive
Boise, Idaho 83704
July 16, 1982

30

Bureau of Land Management
Bruneau-Kuna Grazing EIS
3948 Development Avenue
Boise, Idaho 83705

Re: Bruneau-Kuna Grazing Environmental
Impact Statement.

Gentlemen,

I am strongly opposed to your proposed action for the management of the Bruneau-Kuna public land in Southwest Idaho. I do not feel that its application is in the best interest of the land, the wildlife, the general public, or even the powerful livestock interests who appear to be so opposed to good land use practices; but who through their continued overuse and abuse of this rangeland will eventually destroy its productive capacity.

A cooperative study by the Soil Conservation Service, the Forest Service, the Economic Research Service, and the Department of Water Resources reveals "excessive erosion has been recognized for many years in the Middle Snake River Basin of which this area is a part..(Ada, Adams, Boise, Canyon, Elmore, Gem, Owyhee, Payette, valley, and Washington Counties comprise the makeup of this basin) The total soil erosion from the combined counties amounts to 181,000 acres, or one fourth of the surface irrigated lands... Approximately 4 million tons of erosion occurs every year(plugging up our streams and filling up our reservoirs). Although erosion on undisturbed rangeland is relatively small per acre, significant quantities of sediment are produced because of the large acreage of rangeland. Three hundred thousand acres need improved vegetative cover. Light or even moderate grazing would allow grasses to develop maximum root and vegetative growth and would provide adequate erosion control and increased forage production"

In spite of the fact that you must have had access to this information you plan to increase livestock allocations to 202,275 AUM's, which is 7 % above the past five-year licensed use.

One of the most heartless aspects of your planning, in my opinion, is your sacrifice of the Bighorn sheep to the cattle interests. Numerous authorities whom I have read cite over-grazing by domestic animals as the major reason for the elimination of the Ovis Canadensis Californians in Washington, Oregon, Nevada, and Idaho at the turn of the century.

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Their reintroduction into Idaho was brought about as you are aware through the cooperative effort of the Idaho Fish and Game Department and the Bureau of Land Management. The Fish and Game Department obtained surplus bighorns from the Williams Lake, British Columbia area and the BLM assumed the responsibility for the protection of their habitat... One of the key components in the Bighorns successful adaptation to the Little Jacks Creek area has been the natural barrier that the lack of water on the rims of the canyons has provided. This has caused a natural separation of domestic livestock and the wild herds... and is a condition that is now being threatened by the introduction of a pipeline (into one of the major gathering areas of the bighorns) to provide water for cattle.

James K. Morgan in his article Last Stand For the Bighorns (National Geographic, 1973) makes the following statement that is as appropriate today as it was when he wrote it. " A practice that figures heavily in the continued decline of some remanant bighorn populations on public lands is the Bureau of Land Managements range improvement programs. Acreage with easy accessibility and available water was the first to be used for livestock grazing and bighorn have long been extinct on those grasslands. Remanant bighorn herds have hung on by utilizing the remote and difficult-to-graze nooks and crannies. But as range improvement money becomes available, the Bureau develops roads, trails, fences, water holes, and water pipe lines into remote parts of the range to facilitate dispersal of livestock. This steady invasion of their last winter ranges subjects bighorns to intensified human activity and competition for preferred forage." He further states " A new approach to overgrazing on public lands is " rest rotation " or resting the grass plants during at least one year out of three or four. Some studies suggest that rest-rotation grazing unless accompanied by a reduction in livestock numbers, may sometimes increase the damage. Streams suffer as heavy livestock use causes fish-sheltering banks to cave off; fencing necessary for the rest-rotation program is detrimental to wildlife" Morgan contends that the blame for the poor condition of the range and the impact on the bighorns cannot simply be put on the Bureau. It is charged with administration of public grazing lands, but has lacked public and legislative support to reduce the number of grazing permits.

Keeping the above in mind, it is my opinion that the Bureau of Land Management in advancing the development of AUM's for cattle at the expense of all other values is in conflict with Public Law 94-579 (1976)

7/20/76
Boise, Idaho
7/20/76

Bureau of Land Management
Brunese-Kuna Grazing. AIB
3-Mile Development Avenue
Boise, Idaho 83705

Re: Brunese-Kuna Grazing, Bighorn
Impact Statement, Water Pipe Line

Gentlemen:

My interest developed in the proposed construction of a pipeline between Little Jacks and Big Jacks Creek after the Bureau of Land Management reversed their former decision not to build it.

My background includes dealing with the fire protection aspect of municipal water systems for over a quarter of a century. During this time I became active in the affairs of the American Water Works Association. My knowledge about water systems made me aware that the figures being quoted on the estimated cost of the Jacks Creek project were totally unrealistic... The last eleven years of my business life was spent as general manager of a small corporation where I was accountable for the planning and expenditures to a board of directors. That cost had to be substantiated and continuously monitored. As a private citizen I concur with the National Administrations effort to reduce a fiscal burden. The above information may help you to evaluate my concerns and concern.

Your estimated costs apparently were hastily thrown together in rough sketches of previous projects. No engineering analysis has been developed in the proposal.

The well has been drilled and tested out with a flow yield of 37 gallons per minute. The well is located at an elevation of 5,625 feet near sea level. This water will be pumped by a vertical turbine to storage through about five (5) miles of pipe. The storage will be at 7,850 feet and will develop a static head of 330 feet or about 11.5 pounds per square inch at the pump. The pump has not been selected but should be designed to pump against the static head and the friction loss in the pipe. Commercial electricity is not readily available so the energy source will be from an internal combustion engine, either connected by direct drive or through a generator to operate the pump. Operating controls will be used to activate or shut down the pumps as determined by the owner.

30

which states that management of public lands shall be on the basis of multiple use and sustained yield. The proposed action, in my opinion does neither. Its primary direction is the appeasement of the cattle industry at the expense of the land, the wildlife, and the people whose rightful heritage is that land.

I therefore support Alternative # 4 and would request a more fair allocation of AUM's for wildlife plus an increase in the unallocated forage... I very strongly oppose the introduction of the pipeline into the Jack's Creek Plateau.

Will you please notify me of any action that will affect the Jacks' Creek Plateau and the wilderness study areas.

Sincerely,

Marjorie G. Hayes
Marjorie G. Hayes

tion of the water in the storage tank. The pipe must will need to be strong and of a high class to accommodate the pumping head and surges of water when the check valve closes.

31

Staff at the BLM advised that the storage cannot stand out like a sore thumb which means storage in excavation. A re-inforced concrete tank would probably be the most logical choice. The four gravity lines from the storage will require higher (heavier) class pipe. The line running to the Southeast will experience static pressure of over 135 PSI (pounds per square inch). The Northeast line elevation difference would create pressures of about 240 PSI and the line extending down the present natural gas line corridor indicated a drop of 1970 feet, or over 340 PSI at the extreme end of the line. This will necessitate the use of a surge tank and or pressure regulators on two (2) of the branches. Regulators are not very satisfactory. The surge tanks would require some flow control devices at the storage site to prevent waste and over-flow conditions.

Pipe is to be laid in a trench bury. 36 inch tests have been made along any of the line but no soil surveys by the BLM staff indicate 36 to 48 inch soil depths is all but the surface near the storage. 36 pipe-line where depths are 10 to 20 inches.

Though another recepticle to make water available to livestock has not been determined nor has the number been identified, the EIS statement mentions one per mile. It would appear some kind of controls would be needed to regulate the flow into open recepticles which would approximate the demands of the livestock.

After discussing this project with consulting engineers, it appears there are two items where cost estimates could be made and one item which has been determined.

The well cost \$ 11,000 dollars. I am advised that this will not be charged to the project since it is already paid for. This is nonsense since it has no other function than to serve the Jacks Creek pipeline.

The reservoir properly reinforced to prevent cracking will cost about \$0.75 per gallon according to a consulting firm engineer. Fifty thousand gallons (50,000) at seventy five cents (75) equals \$3,750 dollars. This estimate is probably low because it is a quote for a municipality and does not include the cost of transportation to this remote site.

The reported number of pipe would equal about one hundred thousand (100,000) linear feet. Although much of the pipe can be purchased

for fifty cents (50) a foot and the BLM has a pretty efficient office of trenching and pipe laying equipment, I have estimated ^{one} dollar (1) per foot overall cost due to probable rock areas in the corridor and the need for high class pipe for a good portion of the project. This would amount to from one hundred thousand (100,000) to one hundred and twenty five thousand (125,000) dollars.

Other costs the BLM must consider are:

- (1) Engineering costs for either the contractor or the BLM personnel.
- (2) Pumps, motor power, fuel storage and housing at the well.
- (3) Controls, valves, and surges or pressure regulating devices for the lines.
- (4) Troughs or other appurtenances which would make the water available to the livestock.
- (5) Operating costs, which should include knowledgeable personnel capable of repairing breakdowns in any of the many mechanical devices that will be necessary to properly operate this system. (Prolonged failure of any major components can cause heavy losses of livestock, such as was experienced in Eastern Oregon about five years ago.
- (6) Roads for the maintenance of the project have not been considered but logic tells us that for the upkeep of a project of this size would be necessary.

Even with this very incomplete information I would recommend abandonment of the whole project. The BLM estimate itself of the need of \$100,000 to make available 2,350 AUM's is fiscally irresponsible... especially so when the AUM's will steadily decline from the moment grazing begins. The EIS notes that as well as the negative affect on other uses.

Using the starting figure of 2300 AUM's, this will yield \$100 per unit per annum or \$6900 per year. Half of the fees paid will be allocated to the stockman in the form of range improvement. If all range improvement funds were applied to the \$163,000 expenditure it would take some forty seven years of todays dollars with no interest consideration to retire the project cost. No operating or replacement costs are included, and the figures are extremely low if my assessments are correct.

This project just does not make sense... It appears to me to be a pure and simple subsidy of a few operators of the livestock industry at public expense.

Response to Letter No. 31

31.1 A more detailed description of the pipeline development specifications and revised construction and operating costs have been included in the revised description of the proposed action. Following is a breakdown of the costs included in the EIS.

Item	Cost	
	Proposed Action	Alternative 3 Increased Livestock Use
Mainline		
Materials - 26,800 ft - 4" PVC	\$ 33,500	\$ 33,500
Installation	10,720	10,720
Pump Station		
Materials - 7 1/2 HP pump, 20 KW diesel, pumphouse, generator	20,500	20,500
Installation	11,000	11,000
Roadwork	2,000	2,000
Storage Reservoir		
Proposed Action - 500,000 gallon	20,000	
Alternative 3 - 1,000,000 gallon		35,000
Lateral Lines - P.A. - 72,400 ft, Alt. 3 - 169,500 ft		
Materials - 1 1/2 or 2" poly pipe	31,856	74,580
Labor	5,480	12,840
Troughs - P.A. - 13, Alt. 3 - 29		
Material	3,900	8,700
Labor (includes valve installation)	4,900	11,100
Misc. (Valves, etc.)		
	7,535	17,655
Guzzlers - P.A. - 13, Alt. 3 - 29		
	5,200	11,600
TOTAL		
Materials	102,491	166,535
Labor	54,100	82,660
	<u>\$156,591</u>	<u>\$249,195</u>

Should the BLM insist on proceeding I would appreciate a copy of your cost analysis and identification of the beneficiaries of this project.

For the record I support Alternative 4 for reduced livestock use to become your proposed action.

Thank you for considering this letter and for the EIS statement.

Sincerely,

William S. Hayes
William S. Hayes.

CC: Hon. Jim McCluge
Hon. Steve Symms
Hon. Larry Craig
Clair W. Whitlock



SIERRA CLUB
NORTHERN ROCKIES CHAPTER
MIDDLE SNAKE GROUP
BOX 552
BOISE, ID 83701

July 19, 1982

Martin J. Zimmer, Manager
Boise District, BLM
3948 Development Avenue
Boise, ID 83705

Dear Mr. Zimmer:

Thank you for the opportunity to comment on the Bruneau-Kuna grazing Draft Environmental Impact Statement. We feel the Proposed Action does not meet multiple use standard mandated by FLPMA. In addition, we feel the conclusions reached in analyzing the impact of the proposed action are often not supported by the DEIS.

32.1

1. The DEIS states the proposed action will have no significant effect on Climate, Topography, Minerals, Geology, Air Quality, Threatened and Endangered Plant and Wildlife Species, Cultural Resources, Flood Plains and Prime or Unique Farmlands. What is the basis for this conclusion?

32.2

2. The DEIS is based on several assumptions, including:
a. Funding available to BLM will be adequate to implement all portions of the proposed action.
b. BLM will be adequately staffed.
c. Water developments will be completed in 5 years.
d. Some beneficial effects will accrue from grazing deferment.
e. Acreage identified for treatment will be treated although this may vary from allotment to allotment.
What is the basis for these assumptions? What will be the effect if these assumptions are not valid? What would be the effect of variations in land treatment from allotment to allotment?

32.3

3. The DEIS notes the response of existing vegetation depends on the present condition of the vegetation. BLM's ability to plan is, therefore, dependent on your data base of the range resource.
Has BLM had the resources available to develop an adequate inventory? Will you have the resources to monitor the range over the next decade? How many man months have been used for inventory in the past? How many are budgeted for the future? How about transportation resources?

STATE DIRECTOR'S OFFICE
BLM - IDAHO

32

JUL 19 1982

910	SD
	ABD
	EEC
912	PRO
930	RES
940	OPS
950	ACM
Additional Routing	
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SIERRA CLUB

NORTHERN ROCKIES CHAPTER MIDDLE SNAKE GROUP

BOX 552
BOISE, ID 83701

32



SIERRA CLUB

NORTHERN ROCKIES CHAPTER MIDDLE SNAKE GROUP

BOX 552
BOISE, ID 83707

32

- 32.4 4. The DEIS analysis of the effect on riparian zones points out the nonfenced areas will not improve. The effects do not appear to be further analyzed. Given the critical nature of these areas and the probable increased grazing pressure on them, we feel the effect of the proposed action should receive detailed analysis.
- 32.5 5. The DEIS states that in those allotments where there will be an increase in initial livestock use 20% of the acreage is predicted to improve in range condition. What is the basis for this prediction? The DEIS states monitoring will be required before a higher prediction can be made. This leads to the possibility that the prediction is not firm. Have alternate outcomes been analyzed?
- 32.6 6. The DEIS (pg. 4-3) states that range condition on allotments with large areas in poor condition is expected to improve even though some will receive increased grazing use because stocking rates on all ranges are "based on proper livestock use levels." We don't follow the logic. We feel that in most cases poor range condition is the result of livestock use and increasing that use is unlikely to improve the condition at the point of increase.
- 32.7 7. The DEIS states land treatment will lead to a reduction in native shrubs and replacement with highly palatable native and introduced grasses and shrubs. It does not say what plants will be introduced or discuss the ratio of native to introduced. Nor does it give a basis for the conclusion that native shrubs will re-establish themselves. Will this re-establishment require re-treatment? What is the projected lifetime of land treatment projects?
- 32.8 8. The DEIS notes that unfenced riparian zones will suffer soil surface disturbance and heavy utilization. What will be the effects of this abuse?
- 32.9 9. The DEIS, in discussing antelope, points out that:
a. Dietary overlap is the limiting factor on antelope.
b. The adverse effect of water developments.
c. The hazards presented by new fences.
The conclusion that the proposed action will result in no change does not appear to follow from the discussion.

- 32.10 10. The DEIS concludes the proposed action will be generally beneficial to Big Horn sheep. This conclusion does not appear to be supported by the analysis. For example:
a. Two to three square miles of Big Horn habitat east of Rattlesnake Creek will become available for livestock with displacement of Big Horn sheep.
b. In the Battle Creek area there is inadequate information to determine the effect but the DEIS acknowledges loss of the entire population is possible.
- The DEIS acknowledges the Jack's Creek Pipeline is inconsistent with the proposed action stipulation. It further acknowledges that meeting Big Horn sheep objectives is dependent on a speculative improvement in habitat in the Battle Creek allotment.
- 32.11 11. For Sagegrouse the DEIS discusses several factors but there is no train of logic or evidence leading to the conclusion that population levels will remain at current levels.

If forced to choose an alternative from the alternatives offered, we would urge you to select alternative 4. (Reduced livestock use). We make this recommendation, not because we oppose grazing, but because this alternative appears to offer the best chance for management of the Resource Area consistent with the principle of multiple use. We would prefer to see construction of an alternative defined in terms of the range resource. What measures are needed to protect all riparian zones, improve all range to at least good condition and improve wildlife habitat to the point that wildlife is limited by factors other than range. Once these parameters have been determined, what level of grazing can be accommodated within them? We would like to see such an alternative presented because we feel it would be a viable alternative within the multiple use mandate of FLPMA.

Thank you for your consideration of these comments.

Charles C. Yoder
Charles C. Yoder
Chairman

Response to Letter No. 32

- 32.1 Because of the nature of livestock grazing and the associated management practices, their influence would not be sufficient to change the climate, topography, minerals, geology or air quality within the area. Threatened and endangered plant and wildlife species and cultural resources would not be adversely affected because of the management stipulations and standard operating procedures described in the proposed action. Prime and unique farmlands would not be impacted because none would be affected by the proposed action.
- 32.2 a. Based on the implementation cost, the 10 year implementation schedule and the availability of funds from several sources (Public Rangeland Improvement Act [PRIA] funds, grazing advisory board funds, and range betterment funds) it is reasonable to expect that the proposal could be implemented. If money is not available, less project development or management measures would be implemented.
- b. It was necessary to establish a given level so that the impact analysis could be made. If the BLM is not adequately staffed, portions of the proposal may have to be modified. A portion of the manpower needs could come from conservation groups and ranchers.
- c. Because rangeland suitability due to lack of water, was not available on a portion of the area, it was assumed that water would be developed and that the AUMs would be available for livestock use as is reflected in the initial allocation figures. If water is not made available because of lack of funds or conflicts with other resource uses, the initial livestock use would be below that described in the proposed action.
- d. The assumption was that a limited level of deferment would be periodically applied, not that beneficial affects would accrue.
- e. The text has been changed to indicate that the economic and vegetation impacts sections used this assumption. The treatment acreage may be less than this if required to protect other resource values. It was necessary to make this assumption to ensure that other resource values were protected and still provide acreage and production figures for impact assessment in these two elements because site specific projects incorporating other multiple use needs have not been determined. If the acreage of land treatments were reduced, project development costs, forage production, and vegetation improvements would decrease.

- 32.3 We feel that the inventory conducted within the EIS area is adequate for the use which we put it too. We anticipate that we would have funds to monitor within the EIS area. However, it is impossible to say if funds would be sufficient to monitor all elements of the proposal to the degree we would like. Because of the time element involved in documenting past inventory cost and because of the little value it would have in assessing future inventory or monitoring costs or needs, this data was not calculated. We do not foresee any transportation associated problems.
- 32.4 The impacts of the proposal to riparian associated wildlife has been expanded. See text change section.
- 32.5 The prediction is based on professional judgement as well as documented literature. There are several references listed on page 4-3 of the DEIS on various studies that have shown improvement in range condition has resulted when intensive livestock management practices have been applied and livestock grazing is taking place at the proper use level. If range improvement does not occur, adjustments in grazing management (season-of-use, number of livestock, grazing systems, etc.) would be initiated.
- 32.6 The allocation is based on plant and animal needs along with the basic watershed needs. On some allotments, seeding projects have been completed in the last 10 years and the additional forage has never been adjudicated (i.e. the Center Allotment). Also in most cases the pastures in an allotment in poor range condition showed a reduction in livestock use. Within these same allotments, there are pastures in fair and good range condition where increases in AUMs outweighed the reductions indicated in the poor range condition pastures. Thus an overall increase in AUMs resulted even though sizeable reductions were indicated on a pasture basis.
- 32.7 There are some areas where shrubs (i.e. Big Sage) have increased to the point that there is little to no understory and management alone will not change this. Bitterbrush, 4-wing salbrush, winterfat, Russian wild rye, etc. are just some of the plants that could be replanted. To discuss ratios without exact soils, precipitation, climate, etc. can not be done in the context of this EIS but will be done on a site by site basis along with considering the resource needs, such as spring or winter deer use etc. Based on existing treatments within the area, the estimated life span of treatments is approximately 20 years.
- 32.8 This could result in increased sediment and a reduction in the fisheries habitat condition.
- 32.9 See Response No. 22.5.

32.10 In the case of bighorn on Little Jack's Creek, the remaining habitat can probably accomodate the sheep displaced east of Rattlesnake Creek, especially with the implementation of a livestock rotation grazing system. Also see Response No. 22.6.

32.11 See Response No. 22.7.

3603 North 36th
Boise, Idaho 83703
July 19, 1982

Mr. Marlin Zimmer
Bureau of Land Management
3948 Development Avenue
Boise, Idaho 83705

Dear Mr. Zimmer,

Please read the following statement into the hearing on the Bureau-Luna E.C.S.

Following the public hearing on the Bureau-Luna E.C.S. held in Boise July 1, 1982, I examined very carefully the U.S. Constitution. Nowhere in the U.S. Constitution did I find the federal government - through grants, leases, A.U.M.s, nor water projects subsidized by the taxpayers - pledged to help any citizen acquire land and periodically increase the acreage and its productivity so said citizen could provide for all his progeny for generations to come.

I thought that the majority who

testified implied that the federal government owed them a living. It is my understanding that the intent of the present administration is to reduce government welfare, not increase it.

As for our responsibility to feed the world, note:

Jim Russell of the Institute for Food and Development Policy writes, "Pushing agriculture to the limits in the U.S. produces a long list of hidden costs. The energy consumed to produce farm exports cuts that 23 billion surplus virtually in half. ..."

You really can't do much to the present export system without contravening the whole process of capital accumulation. But we're sitting on a time bomb - the natural resource implication of the present policies are truly frightening."

Phil Green in his book Toward a New Food Policy concludes that government action to increase world demand for U.S. farm products will produce domestic inflation, not prosperity for farmers.

In my opinion the arguments favoring the Jack's Creek pipeline were not persuasive.

I am:

1. Opposed to the pipeline
2. In favor of Alternative 4
3. For greater acreage allocation to wildlife

A protesting taxpayer,
Helen Langworthy

Mr. Martin Zimmer
Page 2

July 16, 1982
Box
Boise, ID 83705

Mr. Martin Zimmer
GLM--Boise District Office
3948 Development Avenue
Boise, ID 83705

Dear Mr. Zimmer:

This letter is comment relating to the Bruneau-Kuna Grazing Environmental Impact Statement Draft.

1.1 Limited examination of the document reveals largely unsatisfactory objectives, criteria, and proposals. On page 1-2 the draft states that it was prepared to comply with NEPA, in particular to litigation against the Secretary of the Interior by the NRDC. This case was a landmark decision establishing firmly the need for multiple use management of public lands. However, I believe this document to be an affront to the serious ideals expressed in NEPA, FLPMA, and the court's decision of NRDC vs. Morton. While I can accept the Bureau's duty to protect the dominant use of the resource area (cattle grazing), the Bureau is likewise charged by Congress and the courts to apply this duty in an environmentally sound manner. The present draft does not reflect the type of careful, professional, environmentally sound multiple use management planning the Bureau is capable of.

4.2 In the summary on page iii the document states range condition would improve on 70 percent of the area. Why does it not also state the percentages of improvement for other natural resources? Why are the unspecific phrases "would show improvement," "would adversely impact," and "gradual improvement" used to describe resources such as fisheries habitat, visual resources, and wildlife forage respectively? If range condition can be quantified, why aren't all other resources in the area likewise properly inventoried?

4.3 Recreational use of the area appears vastly underemphasized. Very little attempt is made to establish what effect the proposal will have on recreational users of the area. Was a recreational use survey done? What are the predominant forms of recreation? What seasons, how many persons, what preferences? The impact of the proposed action is reflected only on three forms of recreation: Oregon Trail access, hunting, and fishing (pp 4-17, 18), when in

fact multitudinous types of recreation are enjoyed and rapidly increasing in the area.

34.3 Recreational use of the river systems within the draft area is not once mentioned despite the fact that the rivers and the canyon systems are the paramount topographical features, intriguing ever increasing numbers of recreationists to their flanks. Recreational opportunities offered by free flowing rivers are limited in southern Idaho, the nearest equivalent experience being 140 miles to the north on the Salmon (FERC #2845, Idaho, 1982). Boating use, including whitewater canoeing, rafting, and kayaking, is rapidly increasing, reflecting the trend toward river-oriented recreation (USFS, 1977; Business Week, 1981). Other uses of the river/canyon environs include swimming, dispersed camping, picnicking, hiking, sightseeing, rock collecting, bird watching, and rock climbing. How will these resource users be impacted by the proposed miles of fences, pipelines, brush removal, and other improvements?

By mandate of Congress and reaffirmed by the courts, the GLM must produce management plans representing the scope of multiple use management. While this document says much about forage for livestock, the remaining resources--fisheries, wildlife, visual resources, cultural resources, wilderness, and recreation--are not well considered. In particular, the bighorn sheep, Jack's Creek pipeline, red banded trout, wilderness consideration, river protection, and natural vegetation areas are not well considered.

Considering that agriculture and tourism are the ranking industries in the state of Idaho, this document should reflect a commitment to the values associated with the tourist use of public lands. Wildlife, fisheries, wilderness, recreation, cultural, and visual resources must be considered for the needs of the public at large rather than the needs of only a few dozen cattle producers.

Sincerely,

J. Casey Meredith
J. Casey Meredith

cc: Ms. Johanna Wald, NRDC
Mr. Clair Whitlock, GLM

Response to Letter No. 34

References

Business Week. 1981. Rafting and relaxing on America's rivers. July 6, 1981, p 99.

Federal Energy Regulatory Commission. 1982. FERC #2845 Idaho. Draft. Feb. 1982, pp 3-38.

USFS. 1977. Proceedings; river recreation management and research symposium. North Central Forest Experiment Station, Minneapolis. Jan. 1977, 455 pp.

34.1 See Response No. 21.1.

34.2 It was felt that if all of the specific quantification data were presented in the summary, it would detract from its usefulness in providing a general overview of the EIS. The 70% figures for range improvement is in itself a summary of more detailed data. The comparative impact table (Table 2-12) provides additional quantification.

34.3 The management framework plan (MFP) for the Bruneau/Kuna Planning Units analyzes and addresses numerous outdoor recreation opportunities and uses occurring on public land. The MFP presents numerous objectives and recommendations to maintain or improve the outdoor recreation opportunities within the planning unit, such as supporting the proposals that the Bruneau and Owyhee Rivers be included within the National Wild and Scenic Rivers Systems.

For purposes of the grazing environmental impact statement, only those recreation activities significantly impacted by the proposed action and alternatives were addressed. These were determined to be hunting, fishing, visitation of the Oregon Trail, and primitive outdoor recreation opportunities. The latter is addressed within the wilderness portions of the EIS. Several other recreation opportunities, such as off-road vehicle use, would be effected by the proposed action or alternatives, but the impacts were not considered to be significant since the amount of recreation use or the quality of the experiences would not be changed much.

ARE 79 livestock permittees ~~are~~ to be effectually granted their own
rangeland reservation, in which, they are allowed to ring wring dry most of the natural
resources of the KBRA for their own benefit? Here is how the BLM and their 79 constituents
propose to allocate ^{CAR} ~~their~~ share of the wonderful natural resources in the KBRA. The
following information was revealed by the Draft Environmental Impact Statement (EIS)
which was conducted for this Resource Management Study Process (RMP).

- * Rare, sensitive and endangered species will be victimized, along with large game animals, as the proposed plan allocates 99% of the grass forage to cattle, 1% to wildlife!
- * 96% of the total forage produced on the range, year-round, will be consumed!
- * The Management Proposal for the Snake River Birds of Prey Natural Area calls for maximizing livestock use on already poor range conditions, threatening the fragile ecological balance there. A single year of drought or below-normal rainfall will be fatal to the ^{inferior} ~~poor~~ vegetation that remains, disrupting the raptor food cycle and their reproduction, ~~100~~ 100% of all natural forage produced ^{MORE} ~~year-round~~ is designated for consumption with no allocation to wildlife!

TIM KESINGER
& VALERIE RYAN

810 N. 14
BASE, IDAHO
83702

are 1/5th the private market rate and 2) government funds amounting to 70% of all expenses
for range improvement projects. While the general public must carry the financial burden
of a rangeland welfare system, it may also have to live with such resource planning
decisions which ~~we~~ accept benefits from less than one percent of the KBRA's beef
production over benefits derived from 100 rare California bighorn sheep that inhabit the
canyon of Little Jacks Creek and its surrounding rim plateaus. This is 3% of the world's
entire population of this species. The EIS reveals a certainty that some of these desert
bighorns would be displaced while others would be adversely affected. Similar proposals
would continue ^{to} ~~an~~ obstruction of the increase in bighorn populations by withholding
their lost habitats in Big Jacks, Bruneau, and Shoefly canyons. ^{ff} Somehow the BLM sees a
great benefit in a proposal that would immigrate cows to a yet unexploited new host that
is the KBRA's final 2% stronghold ^{for} ~~as~~ original natural ecological conditions. The Draft EIS
recognizes this island of ecology as the only area in the entire KBRA with a present or
potential condition for "complete recovery from the affects of man". It is also pointed
out that with the passing of this extremely rare resource, go its values for "scientific
studies that include ecological and evolutionary processes, functioning outside the
affects of man". For this purpose and in the terms of the 20-Year Plan, the remainder of
the KBRA is completely unsalvageable!

The final approval of the BLM's proposed action would ^{completely} ~~make total~~ man's reign in the
KBRA.

- * Nearly 300 miles of streams (49% in the KBRA) are designated by the Plan to continue declining from a condition that is already fair to poor!
 - * Increased and unchecked livestock use will contribute to the inevitable decline of nearly 1,000 archaeological and historical sites, over 80% of the known sites in the KBRA. 35 sites have already been destroyed!
 - * 5 proposed wilderness units and 3 others under study will be ^{SEVERELY AFFECTED} ~~forced to retreat~~ in some areas by ~~the~~ the advance of major development!
 - * ^{THE} ~~Rare~~ ^{NCAH} ~~pristine natural areas~~ ~~on the low remaining plateaus~~ will be extinguished by their pristine values by introduction of development and livestock grazing! ^{only 1/10 of 1% of the land base in the KBRA will be preserved at the end of 20 years,}
- The BLM's tendency for ~~environmental~~ environmental destruction invites an inquiry into livestock production on public lands. What is this awesome overriding purpose which so dominates allocation of natural resources in the KBRA? It is of course, profit, the one motive that is always justified. And what is the good sum that will compensate the American people for the loss of culture, ecology and recreation on their own land? The Draft EIS has addressed this issue, computing the total net worth (benefits minus cost) of the ~~Proposed~~ Proposed Action. This total "tips the scale" at ~~\$500,000~~ \$500,700 for the entire 20-Year Management Period. As an annual allotment to 79 permittees, this would represent \$318 ~~profit~~ profit to each permittee! Though the monetary benefits from the grazing uses in the KBRA are paltry, the subsidies that come out of Washington, D.C. amount to a ~~great~~ fortune. These subsidies are presented in the form of 1) range use fees that

- 35.1 1. BLM SHOULD EVALUATE THE BENEFITS OF MAXIMIZING OTHER RESOURCE VALUES SUCH AS WILDLIFE. "OPTIMUM CONDITIONS" IS NOT A FULL CONSIDERATION.
- 35.2 2. THERE SHOULD BE AN EIS STUDY TO DETERMINE THE EXTENT OF CONFLICT IF COWS ARE KEPT OUT OF 100 MORE MILES OF STREAM BEDS. (ARCH. SITES, FISH HABITAT, WATER QUALITY, SOILS & VEGETATION AND WILD. VALUES WOULD ALL BENEFIT)
- 3. YOU SHOULD CONSIDER COST/BENEFIT AND THE FACT THAT 1.15% IS HARDLY WORTH IT.
- 4. PRESERVE BIG & LITTLE JACKS, KEEP OUT THE PIPE.
- 5. ALLOCATE MORE AUMS TO WILDLIFE, PARTICULARLY IN WILDERNESS & SNAKE RIVER NATURAL AREA

Response to Letter No. 35

- 35.1 The preliminary alternatives presented at the scoping meeting on December 1, 1981 included an alternative that maximized uses other than livestock grazing as well as one that maximized livestock use. Numerous comments on the alternative, indicated that maximizing any resource use was not appropriate for a multiple use plan. Consequently, the alternatives were modified and maximizing any specific use was not considered in the Draft EIS. Since the Management Framework Plan, the basis for the EIS, is a multiple use planning document, a maximize wildlife alternative will not be prepared.
- 35.2 An alternative which would eliminate cattle from an additional 100 miles of stream was considered. To accomplish this, however, would require approximately 150-200 miles of fencing. In the proposed action, livestock use of streams would be controlled with a combination of gap fences and rim rocks. Given the cost of fence construction and maintenance, excluding cattle use on additional stream miles is not considered to be a reasonable alternative.

Mr. Martin Zimmer,
District Manager
Boise District BLM
3948 Development Avenue
Boise, Idaho 83705

Dear Mr. Zimmer:

I would like to make the following comments on the Draft Bruneau Kuna Grazing EIS.

1. I am strongly opposed to the construction of any pipeline on the Big Jacks-Little Jacks Creek plateau. The pipeline will have an adverse impact on bighorn sheep; it will destroy some of the last remnants of desert grasslands in good ecological condition; and it will have an adverse impact on mule deer and other wildlife.

The BLM should do a separate EIS on the Jacks Creek pipeline proposal before granting approval for it. At a minimum, the final Bruneau-Kuna EIS should include the following information: a detailed cost-benefit analysis of the pipeline; a detailed cost-benefit analysis of several alternatives to the pipeline, such as range improvements on Wickney Tree dome; a detailed assessment of the economic value of the California bighorn sheep population; an assessment of the status of the species throughout North America; a detailed analysis of the impacts of the pipeline on mule deer, antelope, sage grouse, bobcat, and any other sensitive wildlife species; an assessment of the impacts of the pipeline on the Idaho Fish and Game proposal to reintroduce bighorn into Big Jacks Creek; an assessment of the pipeline impacts on the ecology of the grassland; and a detailed description of how the decision to build the pipeline was made, especially in light of the overwhelming public opposition to the project.

2. I think the BLM allocation of 1% of the competitive forage to wildlife is far too low, and not in line with the BLM's legal mandate of multiple use management of the public lands. More unallocated forage should be included in the preferred alternative. The final EIS should include more documentation of the effects of the Proposed Action on mule deer, antelope, sage grouse, and other wildlife species, as well as on the ecological condition of the good-quality areas proposed for grazing. No mention is made in the Draft EIS of Research Natural Areas proposed in the Bruneau-Kuna Resource area, and the impact of the proposed action or any of the alternatives on RNAs. Because of the beneficial impacts on wildlife (while still allowing almost as many cattle as the Proposed Action) I urge BLM to adopt alternative 4, the Reduced Livestock Use alternative.

3. I support the BLM Wilderness recommendations for the Owyhee River and the other areas, but would like to see BLM include more of the Bruneau Plateau, Big and Little Jacks Creeks, and other portions of the WSAs.

Thank you for this opportunity to comment.

Sincerely,

Tim Evans
Tim Evans



COMMITTEE FOR IDAHO'S
HIGH DESERT
P.O. BOX 463 BOISE, IDAHO 83701

19 July 1982

Mr. Martin Zimmer,
District Manager
Boise District Office
Bureau of Land Management
3948 Development Avenue
Boise, Idaho 83705

Dear Mr. Zimmer:

On behalf of the Committee for Idaho's High Desert and its members, I would like to make the following comments on the Draft Bruneau-Kuna Grazing EIS.

GENERAL COMMENTS

In general, we are disappointed with the quality of the DEIS. Specifically, we think the following concerns need to be addressed:

1. **Range of Alternatives.** The DEIS does not provide an adequate range of alternatives. Of the five alternatives offered, only one (the No Grazing alternative) explores a grazing level lower than present. Although the Continue Present Management alternative also results in decreased grazing in the long term, we do not believe this can realistically be considered a reduced grazing alternative.

2. **Decision Criteria.** We cannot find any reference to decision criteria in the DEIS. There is no explanation for how the alternatives were evaluated, how the preferred alternative was selected, or how the Preferred Action meets the issues and concerns identified during the scoping process.

3. **Public Involvement.** There is no discussion of how the public was involved in the scoping process, or how public issues and concerns were evaluated and incorporated into the decision-making process. There is also no discussion of how public comments are to be incorporated into the Final EIS.

4. **Coordination with Other Agencies.** There is no mention of coordination with the Idaho Department of Fish and Game, the U.S. Fish and Wildlife Service, the Soil Conservation Service, or other State and Federal agencies in the development and evaluation of alternatives.

5. **Cumulative Impacts.** Because of the general nature of the information presented, it is not possible to adequately analyze the cumulative impacts of the alternatives on wildlife and other resources.

SPECIFIC COMMENTS

1. Jacks Creek Pipeline Proposal

The Committee strongly opposes any pipeline proposed for the plateau between Big and Little Jacks Creeks. The pipeline will have a harmful effect on California bighorn sheep, a rare species; it will destroy some of the best-quality grasslands remaining in Southern Idaho, another rare commodity with significant ecological and scientific values; and it will have a negative impact on mule deer,

Letter No. 36 contained the same comments as three additional letters. Those three have not been reprinted.

36.1 See Response No. 2.1 and 2.2.

36.2 See Response No. 2.4.

36.3 The Bruneau and Kuna Management Framework Plans identified two areas to be further studied for designation as Research Natural Areas. One area is near the confluence of Rattlesnake Creek and Little Jacks Creek (Sec. 5, T.9S., R.3E.) within the Battle Creek Allotment. The other (called Oolitic Limestone) is located along the Mud Flat Road (Sec. 5, T.7S., R.3E.) in the Castle Creek Allotment.

The proposed action would affect the natural values on approximately 40% of the Little Jacks/Rattlesnake Creek Area. The portion affected is within 2 miles of the proposed Jacks Creek pipeline and would receive increased livestock use.

Under the proposed action, livestock reductions and management proposals for the Castle Creek Allotment would enhance vegetation and natural values on the Oolitic Limestone Area.

The increased livestock use alternative would adversely impact the natural values on the Little Jacks Creek area. This was documented in the draft EIS on page 4-41. The impact of this alternative on the Oolitic Limestone Area would be the same as described for the proposed action.

The reduced livestock use alternative would not affect the natural values of the Little Jacks/Rattlesnake Creek Area. The Oolitic Limestone Area would be impacted as described in the proposed action.

antelope, and other wildlife species.

We request that the following analyses be included in the Final EIS regarding the pipeline:

a. a detailed cost breakdown and benefit-cost analysis for the pipeline. We consider this a critical analysis. Our investigations show that the pipeline will have a 47-year payback period - even though the life of the PVC pipe used in the pipeline is only 20 years under good conditions, and possibly as short as 10 years!

b. a detailed cost analysis and benefit-cost analysis of at least two alternatives to the pipeline, including range improvements on Wickney Tree dome;

c. an analysis of the impact of the pipeline on the Idaho Fish and Game proposal to reintroduce California bighorn into Big Jacks Creek;

d. a detailed analysis of the impacts of the project on mule deer, antelope, sage grouse, bobcat, and any other sensitive wildlife species. This should include an analysis of the impact of cattle grazing on game winter range, and any impacts this may have on reproductive success (both during gestation and after birth);

e. an analysis of the impacts of cattle grazing on the reproductive success of bighorn sheep (both during gestation and after birth);

f. an assessment of the current status and population trends of California bighorn in North America, and a more detailed description of the current status of the Battle Creek and other Idaho populations and how proposed BLM projects will affect these populations;

g. an analysis of the economic value of California bighorn in Idaho, and the Jacks Creek population in particular;

h. an analysis of the impacts of the pipeline and grazing on the range condition, the ecology of the grasslands, and the existing mammal and other animal communities; and

i. a discussion of the quality of the grasslands, and the relative abundance of such a habitat type;

j. a detailed description of how the decision to build the pipeline was made, particularly in light of the strong public opposition to the project.

Due to public opposition to the project, the lack of site-specific information and the degree of public controversy, we ask you not to make a final decision regarding the pipeline in this EIS but rather complete a separate, much more detailed EIS on the project before granting final approval to the pipeline.

On page 2-9 of the DEIS the following BLM policy is quoted: "A separation of use between cattle and bighorns would be maintained by not developing livestock water sources within bighorn habitat unless the potential adverse impact to bighorn sheep can be avoided or mitigated." The final EIS should examine how the Jacks Creek pipeline conforms with this policy, and describe in detail the mitigation measures BLM proposes for the pipeline in order for the project to conform with the policy quoted above.

2. Forage Allocated to Wildlife

The amount of competitive forage allocated to wildlife is unreasonable, and far too low to meet the BLM's mandate of multiple

use management of the public lands. The Owyhee Wilderness DEIS (page V-3) states that 2.5% of any AUM increase resulting from land treatment will be allocated to mule deer; we believe that a 2.5% allocation of all competitive forage to wildlife is much more reasonable than the 1% in the Proposed Action.

The FEIS needs to document, in more detail, the effect of the Proposed Action on mule deer, antelope, and sage grouse populations.

There is no discussion of the Idaho Department of Fish and Game population targets for mule deer, antelope, and other big game species within the RA, or how BLM intends to meet these targets.

We completely fail to understand how BLM can propose the same amount of forage be allocated to wildlife in all alternatives. This is a noteworthy failure to provide a reasonable range of alternatives for a critical resource.

3. Unallocated Forage

We strongly oppose leaving only the miniscule amount of unallocated forage proposed in the Preferred Alternative. The last quality grasslands should not be sacrificed for additional AUMs, particularly when BLM is not proposing to protect any areas for their scientific or ecological value. These areas are important genetic and scientific areas, and the entire Resource Area should not be leveled to a common range quality denominator for the sake of a single use - livestock grazing.

The DEIS details quite well the adverse impacts that livestock have on the ecology of the high desert grasslands. BLM needs to explain in the FEIS how the decision was made to virtually eliminate the remaining good-quality grasslands, in light of this description.

4. Research Natural Areas

No where in the DEIS is any mention made of Research Natural Areas, although several are proposed within the Bruneau-Kuna Resource Area. Since RNA designation would, on a site-specific basis, affect grazing, this should be included in the FEIS.

5. Fisheries

The Proposed Action does far too little to restore fisheries to an acceptable level. After 20 years, 54% of the fish habitat in the RA would still be in a "fair" or "poor" condition. This is far too low a level, and again does not meet the BLM mandate for multiple use management of the public lands.

6. Preferred Alternative

The Committee for Idaho's High Desert supports adoption of Alternative 4, the Reduced Livestock Use alternative, for the following reasons:

1. The alternative allows higher populations of mule deer, antelope, bighorn sheep, sage grouse, and other wildlife species;
2. The alternative includes a higher level of water quality and better fisheries;
3. The alternative allocates a higher amount of forage to the "unallocated" category, which not only ensures healthier fish and wildlife populations, but allows protection of healthy representations of the sagebrush steppe ecosystem and the scientific and ecological

values such areas have;

4. The alternative allows the range to recover to a higher level, allowing a significant increase in cattle grazing while still providing a healthy natural environment;

5. The alternative creates more jobs than the Proposed Action;

6. The alternative is based on the money BLM actually expects to receive from grazing receipts, which means this is the only alternative which does not receive taxpayer subsidies.

We urge you to adopt a Preferred Alternative which incorporates more of these elements than the current Proposed Action.

7. Bighorn Sheep

The final EIS needs to do a more thorough analysis of the current status and trends of California bighorn in the RA, and address the possibility of reintroducing bighorn into all the sites included on Map 3-6. More information needs to be provided on the status of the Battle Creek population, and the effects of the proposed action on this population.

8. Wilderness

We support the BLM proposal for the Owyhee River Wilderness and Sheep Creek West. We urge you to include the dropped portions of Duncan Creek, the Bruneau Plateau, Sheep Creek East, Pole Creek, Deep Creek, and Big and Little Jacks Creeks in the final Wilderness recommendations.

Thank you for the opportunity to comment. We look forward to seeing our concerns addressed in the final EIS. If you have any questions regarding the points raised in this letter, please let us know.

Sincerely,
COMMITTEE FOR IDAHO'S
HIGH DESERT

by Bruce R. Boccard
Bruce R. Boccard,
Chairman

cc: Senator McClure
Senator Symms
Congressman Craig
Governor Evans

Response to Letter No. 37

Based on public comments Preliminary Alternatives 3 and 4 above were redesigned so that they do not maximize any particular resource use and are multiple use oriented. Preliminary Alternative 5 (Maximize Livestock Grazing) was dropped from further study.

The proposed action was also modified by expanding it to include additional management proposals and management constraints needed to protect or enhance resource values other than livestock grazing.

The comment and response section of the Final EIS discusses how the public comments are incorporated into the Final EIS. Public comments and concerns will be considered when a final decision affecting the area is made.

37.4 Coordination with the agencies listed as well as with other state and federal agencies has been a continuing process from the initiation of resource inventories through the development of alternatives and assessment of impacts. These agencies were all notified of the MFP and EIS scoping meeting. Input from those agencies attending was considered in the development of the proposed action and alternatives. Because of the limited time period which was available for the preparation of the Draft EIS, impact assessment was completed primarily by the resource specialists on the EIS team. Where specialists felt additional expertise or coordination was needed, appropriate agencies were contacted. The Draft EIS was sent to those agencies listed in the Consultation and Coordination section of the Draft EIS and their concerns and comments have been incorporated into the Final EIS. Also see Response No. 24.36.

37.5 The input analysis presented in the Environmental Consequences chapter represents the cumulative impacts of the various elements of the proposed action. Site specific impacts of various project developments would be further assessed through environmental assessments prior to project development to assess any site specific impacts not covered in this EIS.

37.6 See Response No. 2.1, 3.1 and 31.1.

37.7 The pipeline as presented in the proposed action allows Big Jacks Creek to remain suitable for bighorn reintroduction. The potential impacts to bighorn sheep, if the entire pipeline is built (Increased Livestock Grazing alternative) are described on p. 4-40, 3rd paragraph.

37.8 The pipeline would bring water to areas unwatered and little used by livestock. However, most areas currently in good ecological condition are predicted to remain in good condition. Only areas immediately adjacent to water were predicted to decline. Based on this, the impact to wildlife species inhabiting the area would be minimal.

37.1 An additional lower level of livestock use was considered for inclusion in the Final EIS. However, we feel that the various levels of use analyzed in the Draft EIS will provide BLM with the adequate information to properly allocate available forage between competing uses. Although Alternative 4 (Reduced Livestock Use) provides for an increase in livestock use by the end of the 20 year period, the initial AUM allocation is 26,353 AUMs lower than that in the proposed action.

37.2 Specific decision criteria have not been developed since this EIS is not a decision document. It only analyzes the probable impacts that the proposed action and alternatives would create. The decision on the action to be taken will be based on the analysis contained in the Final EIS, BLM's manpower and budget constraints, public concerns and comments, and multiple-use resource objectives and programs for the area. A summary document that outlines the management direction for the EIS area will be prepared and made available as soon as a decision is reached; tentatively late 1982. This document will provide the rationale for the selected decision.

37.3 Public involvement in the scoping process is described on page 5-1 of the Draft EIS. At the time of the scoping meeting, December 1, 1981, preliminary alternatives and issues were provided to the public. These were based on previous public contacts, MFP recommendations, and EIS Team recommendations. Handouts were provided requesting input on the range of alternatives for the EIS as well as issues to be addressed in the EIS. Based on responses received, the proposed action, alternatives, and issues were modified to reflect public input. The handout at the public hearing identified the following issues for consideration:

1. Vegetative response to proposed management.
2. Impacts of the proposal on wildlife and fisheries resources.
3. Economic and social impact of proposed forage allocations.
4. Impacts of the proposal and alternatives on soil and water resources.

Based on the input received, the issues to be addressed in the EIS were modified to those described on page 1-1 of the Draft EIS.

Preliminary alternatives were also modified based on public input. The original alternatives being considered were: 1) Continue Present Management, 2) No Grazing, 3) Management that could occur without Wilderness Designation, 4) Maximize Uses other than Livestock Grazing, and 5) Maximize Livestock Grazing.

Environmental impacts of livestock on winter ranges are not expected to have negative impacts on big game. On page 2-9 are measures to regulate livestock use through the management of key browse plants. Reproductive failures by mule deer and pronghorn are not expected to occur due to livestock grazing of winter ranges. Such problems are generally related to poor diet. With the regulation of livestock forage consumption, sufficient forage of an identified quality will be protected for big game.

- 37.9 In the case of bighorns, it is not known if cattle would have an affect on reproductive success. It can be reasoned though that through avoidance of livestock, bighorns could be forced to poorer habitat which could result in a less desirable diet and resultant decline in reproductive success. Young born in poorer habitat would also be subject to a lower quality diet.
- 37.10 The proposed action would not affect any of the populations not discussed in the EIS. Therefore the status of these populations are not addressed. The status of the population within the EIS area are included in the Draft EIS. Also see Response No. 37.22.
- 37.11 The economic values of bighorn sheep are reflected in the recreational value they exhibit. This was considered in the EIS. We are aware of "existence" and "option" values but we do not currently have techniques or data to quantify these values; however, they are being considered.
- 37.12 Introduction of the pipeline and resultant grazing on the east side of Little Jacks Creek would have little effect on present range condition or existing mammal populations, other than those mentioned for bighorns in the Draft EIS. This assessment of the pipeline impact on wildlife is based on the prediction that the present range condition class would not decline. It is recognized though, that localized areas around water troughs would be trampled and heavily utilized by livestock. The impacts on the ecological values of the area are discussed on pages 4-15 and 4-16.
- 37.13 The abundance and quality of grasslands in the EIS area is reflected in the present range condition table (Table B-5 and on Maps 3-1 and 3-2). The acreage listed in good condition is primarily a sagebrush bunchgrass type. Approximately 43,000 acres in the good range condition category are located within canyon complexes.
- 37.14 A decision has not been made to build the pipeline. The decision will be made in conjunction with the finalization of the Management Framework Plan for the Bruneau Resource Area. This is scheduled for completion late this year. When a decision is made, a document which summarizes the MFP decisions as well as the pipeline proposal will be issued. This decision document will provide the rationale for the selected course of action regarding the pipeline. Public comment will be carefully considered when making this decision.

specifically evaluated by the Idaho Fish and Game Department. The Department will assess the suitability of the habitat. After this analysis is completed, an environmental assessment and a decision would be made by the BLM.

On Shoofly Creek, an introduction would probably not take place. Habitat expansion by the animals from Little Jacks Creek to Shoofly Creek would probably occur naturally. Based on sightings by local ranchers, this may have already occurred.

Reintroduction of bighorn sheep into the West Fork of the Bruneau River is expected to take place this winter.

Overgrazing problems were identified in the Battle Creek bighorn habitat, possibly affecting the status of this animal. In consultation with the Idaho Department of Fish and Game, the Battle Creek area has been designated as a key management area. Within this area, priority will be given to improving rangeland condition in those allotments adjacent to Battle Creek and reduce bighorn sheep conflicts with livestock.

- 37.15 See Response No. 2.2.
- 37.16 The statement in the bighorn sheep section (page 4-7) is in error. See Response No. 24.9.
- 37.17 The effect of the proposed action on mule deer, antelope and sage grouse was reevaluated. No additional impacts could be identified at this time. Environmental assessments would be prepared, on project developments and grazing systems as these elements of the proposal are implemented, to document any site specific impacts not addressed in this EIS.

- 37.18 Population targets for big game were arrived at in consultation with the Idaho Department of Fish and Game. Forage demand for wildlife is based on the projected 1990 Idaho Fish and Game goals. The 1990 numbers represent reasonable numbers or moderate big game management population levels above current levels.

Forage demand remains the same for all of the EIS alternatives because wildlife forage needs were based on future population goals. These forage needs were satisfied before livestock was allocated forage. The amount of forage needed for the desired population goals was exceeded in alternative 2 (No Grazing) and alternative 4 (Reduced Livestock Use). As a result larger populations of wildlife were predicted.

Meeting big game goals for 1990 will come through improved habitat and resultant improved diet.

- 37.19 The forage allocation does not change between alternatives because each alternative allocates sufficient forage to satisfy the Idaho Department of Fish and Game 1990 population goals. The revised description of the proposed action has been rewritten to provide for population increases following 1990.
- 37.20 See Response No. 28.1.
- 37.21 Two research natural areas were evaluated for designation in the Bruneau-Kuna Management Framework Plan. However, the multiple-use recommendation was to further evaluate these areas because additional information was needed before a designation could be made. Future consideration of these areas would be evaluated through the environmental assessment process to determine their effect on livestock grazing. Also see Response No. 36.3.
- 37.22 All information available on current status and trends of California bighorns in the resource area was used in preparing the Draft EIS.

The reintroduction of California bighorns into sites shown on Map 3-6 of the Draft EIS is expected to continue. Presently both the West Fork of the Bruneau River and the South Fork of the Owyhee River are approved sites, each having an environmental assessment completed. Big Jacks Creek has not yet been

38

1235 Hillside #1
Pullman, Washington
99163
July 19, 1982

Mr. Martin Zimmer, District Manager
Boise District BLM
3948 Development Avenue
Boise, Idaho 83705

Dear Mr. Zimmer:

I would like to make the following comments on the Draft Bruneau-Kuna Grazing EIS.

1. Season of Use. On page 3-3 and throughout the wildlife section which follows there is documentation of the adverse impacts of early cattle grazing on range condition, and the fish, wildlife, and other resources that depend on it. The discussion on page 3-3 is particularly good in documenting the adverse impacts of these practices. However, in the Proposed Action section, Table 2-1 (Forage Allocation-Proposed Action) indicates that the Proposed Season-of-Use is identical to the Existing Season-of-Use. Given the adverse impacts on many resources and the basic productivity of the land that BLM has documented as occurring due to too early livestock turn-out dates, etc., I cannot see how BLM can propose not to change any of the Season-of-Use dates. What criteria did BLM use to establish Season-of-Use dates? What are the impacts of these Seasons on each of the wildlife species targeted by BLM? The final EIS needs to expand the discussion of the proposed Season-of-Use, and how they were determined.

2. AUM Allocation to Wildlife. The DEIS proposes a 35% increase in cattle use in the Resource Area over the next 20 years, but states that there will be no increase in antelope and sage grouse populations, a moderate (15%) increase in mule deer population, and probably a negative impact on California bighorn. How were the wildlife population goals established? How do these goals compare with the Idaho Department of Fish and Game targets for these Game Management Units? How does BLM justify a 35% increase in one use - livestock grazing - with no or slight increases in wildlife populations? This is totally out of line with the balanced multiple use which BLM by law is required to provide.

3. Impacts of the Proposed Action on Bighorn Sheep. The discussion on bighorn sheep (both in the text on page 4-7 and the chart on page 2-24) state that the proposed action would be generally beneficial to bighorn sheep. The discussion then goes on to state that the Proposed Action would result in the loss of 5-10 bighorn in the Little Jacks Creek population and that the Battle Creek population is in jeopardy due to poor range conditions, and that "Range improvement information in this alternative is not specific enough to predict whether the needed habitat improvement would occur." How did BLM arrive at the conclusion that this alternative "would generally be beneficial to bighorns?" What was the criteria used in making this determination? This needs to be carefully explained in the FEIS, because the evidence presented in the DEIS indicates an opposite conclusion - that the Proposed Action will harm bighorn.

38.1

38.2

81 38.3

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Response to Letter No. 38

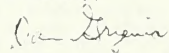
4. Impacts of the Proposed Action on High Quality Grasslands. The Proposed Action will virtually eliminate high-quality (lightly grazed) grasslands, yet there is no discussion of the ecological consequences of such action. The FEIS should include an inventory of the remaining high-quality grasslands in the Boise District, a discussion of the ecology of these areas and how the Proposed Action will affect this ecology, and the impacts of the Proposed Action on the scientific, educational, and ecological values of these grasslands.

5. Jacks Creek Pipeline. I oppose the Jacks Creek pipeline in any form, because of the damage it would cause to bighorn, mule deer, antelope, and the fragile ecology of some of the best quality desert grasslands remaining in southern Idaho. The FEIS should include a detailed economic assessment of the pipeline, a description of how the pipeline fits into the overall management of the allotments, a description of how the allotments could be managed at the current AUM allocation level without the pipeline, and detailed examination of several alternatives to the pipeline. A determination of the legality of the existing allotment plan would also be in order, as no EA or other public document was ever completed on it, in apparent violation of NEPA (this needs to be examined more closely).

In closing, I would like to add that: a) I support adoption of alternative 4, the Reduced Livestock Use alternative; b) the amount of unallocated forage needs to be increased in the final Proposed Action; c) a separate EIS should be completed for the Jacks Creek pipeline; and d) I support the Owyhee River Wilderness recommendations and other recommendations, and support addition of additional acreage (as proposed by the Committee for Idaho's High Desert).

Please incorporate these comments as part of the official comments submitted by the Committee for Idaho's High Desert. Thank you.

Sincerely,



Dan Grzenia

cc: Committee for Idaho's High Desert

The Bengoechea Hotel
SUITE ONE

RANDALL E. MORRIS, D.D.S.

195 North Second West • Post Office Box 732 • Mountain Home, Idaho 83647
Telephone: (208) 587-4326



July 17, 1982

Martin J. Zimmer, District Manager
Bureau of Land Management, Boise District Office
3748 Development Avenue
Boise, Idaho 83705

Dear Mr. Zimmer:

I respectfully offer as public comment the following objections to the Bruneau-Kuna Grazing environmental impact statement draft:

1) No reduced grazing proposal is presented for public consideration. The so called "Reduced Grazing Alternative" actually increases grazing 28% above current levels. The so called "No Grazing Alternative", while valuable in addressing the range resource recovery that is possible through a more balanced and enlightened management policy, is not economically or politically viable at this time.

2) Be that as it may, the Reduced Grazing Plan, if implemented in place of the proposed action, would increase total forage production from 210,479 AUM's to 285,697 AUM's producing fully 90% of the livestock grazing under the proposed action (242,349 AUM's for the reduced grazing Plan vs. 269,785 AUM's for the proposed action) while producing more favorable wildlife and recreational results.

3. Wildlife needs are virtually ignored, violating the legal objectives of multiple use. Out of a total proposed forage production of 287,244 AUM's, 2,333 are allocated to wildlife--less than 1%.

4) The proposed action actually calls for reducing unallocated forage (which presumably is available to wildlife) from its current level of 20,679 AUM's down to 5,871. In other words, wildlife forage will be cut to one-fourth of its present level at the start of the proposed action. The impact on mule deer and antelope may be severe.

4) Eventually under the proposed action, unallocated forage will rise to 11,126 AUM's, barely one-half its current level. Under the Reduced grazing Alternative, the unallocated forage would rise to 40,415 AUM's, double the present level and four times the level of the proposed action.

38.1 As grazing systems or AMPs as implemented, seasons-of-use would be adjusted to correspond to range readiness. Turnout dates would be adjusted to provide for wildlife and other multiple use needs. Specific criteria have not been developed at this time because specific grazing systems, which would effect turnout dates, have not been identified. Impacts related to seasons of use are discussed throughout the environmental consequences section of the Draft EIS.

38.2 See Response No's. 24.7, 24.10 and 24.18.

38.3 See Response No. 22.6.

38.4 See Response No's. 37.12, 37.13 and 37.20.

38.5 The pipeline would allow the Jacks Creek plateau to be incorporated into grazing systems for the Battle Creek and Northwest Allotments. Specific grazing systems, however, will not be identified until allotment management plans are prepared. Likewise, the specific management of these allotments without the pipeline cannot be determined until allotment management plans are developed. Also see Response No. 3.1.

38.6 The original allotment management plan for this area is not considered to be valid. A new allotment management plan will be prepared prior to project development. An environmental assessment will be made on the new AMP. Also, see Response No. 46.1.

39

39

5) Water developments will place livestock in competition with wildlife in portions of the range formerly available to wildlife alone.

6) Antelope and mule deer are heavy utilizers of shrubs, especially during winter. Removal of shrubs via chaining, burning, and spraying may severely stress the food supply, especially in areas receiving new water developments.

39.2 7) Protection of critical winter range is not assured. The winter range value of Little Jack's Creek is not addressed.

8) Also in Little Jack's Creek, the proposed pipeline would allow livestock grazing in areas presently available to bighorn sheep alone. The bighorn herd is presently at the minimum self-sustaining level, but 5 to 10 animals will be lost if the pipeline is built.

39.3 9) Grazing the Jack's Creek Plateau will probably prevent reestablishment of bighorns into Big Jack's Creek.

10) Only two allotments benefit from the pipeline.

11) The pipeline will cost at least \$160,000 to provide stock water to 2300 AUM's. That is about \$70/AUM.

12) The proposed action does not aggressively address the problem of bighorn habitat degradation on the west side of Battle Creek. It is suggested in the draft that the entire herd of 65 animals might be lost if that range is not improved.

13) No effort will be made to protect Wilderness Study Area acreages within WSA's recommended as non-suitable for wilderness.

14) Livestock grazing will be increased on 43,500 acres of the 48,000 acres in "good" ecological condition within WSA's.

15) Wilderness values will be lost irreversibly on 19,250 acres scheduled for brush control and reseedling. The Bruneau Plateau will suffer the most vegetative manipulation.

16) Non-native grass species will be introduced. No plan to reestablish native grass and forb mixtures through the planting of native seeds is offered.

17) Seed drills will be used for planting rather than broadcasting, disrupting the natural appearance of tens of thousands of acres of the desert system.

18) No attempt has been made to preserve an example of the Salt Desert Shrub ecosystem. Although surviving examples are in poor condition, an attempt should be made to preserve an example.

19) There are currently less than 35,000 acres of the Sagebrush Steppe ecosystem in the National Wilderness Preservation System. Of all the millions of acres of Sagebrush Steppe which once existed, Jack's Creek may be the best and only example which remains. A tiny increase in grazing is insufficient justification for its destruction.

- 39.4 20) Protection of potential archaeological sites near proposed water developments is not addressed.
- 21) The present worth of the fees from the Reduced Livestock Grazing Alternative is only \$0.4 million less than from the proposed action (\$3.7 million vs. \$4.2 million), but the present worth of the cost of installing and maintaining improvements is \$200,000 less with the Reduced Grazing Alternative. This is approximately the cost of the Jack's Creek Pipeline, a project which may have a negative benefit/cost ratio.
- 22) The Reduced Grazing Proposal more nearly pays its own way through user grazing fees than does the proposed action. The proposed action requires a greater taxpayer subsidy.
- 23) The Reduced Grazing Alternative creates slightly greater employment than does the proposed action.
- I respectfully offer the following suggestions as alternatives to the proposed action:
- 1) I request that the proposed Jack's Creek pipeline not be built, and the genetic resource present in the California Desert Bighorn be preserved "so long as the grass shall grow, and the Bureau of Land Management shall exist."
- 39.5 2) A detailed economic analysis of the Jack's Creek pipeline project should be done, including a benefit/cost assessment. As a taxpayer I deserve this consideration.
- 39.6 3) A full environmental impact statement should be completed on the pipeline project prior to further consideration. As a recreational user of the area, my needs should be addressed.
- 4) Alternative 4, Reduced Livestock Use, should replace the proposed action.
- 39.7 5) The Allocation for wildlife should be increased.
- 6) The amount of unallocated forage should be increased over the recommendations in the proposed action.
- 39.8 7) The impact on wildlife of water development and shrub removal should be evaluated in detail, especially in critical winter range of mule deer and antelope, specifically the Big and Little Jack's Creek rims, the Shoofly drainage, the Owyhee River rims, the Deep Creek Drainage, and the Bruneau Plateau between Sheep Creek and the Bruneau River.
- 39.9 8) Develop a firm management plan for preserving the Bighorn herd on the west side of Battle Creek.
- 39.10 9) Do not allow livestock grazing to increase within Wilderness Study Areas.

Response to Letter No. 39

- 39.1 See Response No. 37.1.
- 39.2 See Response No. 37.8.
- 39.3 See Response No. 37.7.
- 39.4 The standard operating procedures described in the proposed action would protect the archaeological sites near proposed water developments.
- 39.5 See Response No. 2.1.
- 39.6 See Response No. 2.2.
- 39.7 See Response No. 2.3.
- 39.8 Based on the vegetative predictions (Appendix Tables B-5 and B-7) and measures to protect big game cover needs (pp. 2-8, 2-9), shrub removal should not adversely affect mule deer or antelope habitat. Big game habitat requirements would be incorporated in the design of range treatment projects.
- In areas unused by livestock, due to limited water, the vegetative prediction is that these areas would not decline in condition with the addition of water and livestock use. Monitoring would be initiated to insure that no decline in condition occurs.
- 39.9 Based on comments received, priority would be given to improving the rangeland condition adjacent to Battle Creek to reduce bighorn sheep conflicts with livestock. See Response 22.6.
- 39.10 All WSAs would be managed under the Wilderness Interim Management Policy to protect wilderness values until they are released from wilderness review.
- 39.11 These recommendations are already incorporated into the development constraints and standard operating procedures described in the proposed action.

- 39.10 10) As an alternative to destroying nearly 20,000 acres of potential wilderness through an insensitive clearing and reseeding assault, consider burning and broadcasting native grass mixtures to preserve the existing ecosystems, especially on the Bruneau Plateau.
- 11) Plan developments and road locations to protect potential archaeological sites.
- 39.11 12) Become sensitive to the visual impact on the Bruneau Plateau of the planned roads and developments. The sense of vastness, the sense of solitude, the sense of natural environment is a resource that cannot be replaced or restored. Specifically, the vistas from just north of the mouth of Sheep Creek south toward the Jarbridge Mountains should be preserved. This consideration should be made in conjunction with the Jarbridge WSA on the east side of the Bruneau and Jarbridge Rivers. An outstanding visual resource exists from the Blackstone and J-P Deserts on the west side of the Bruneau River eastward to the crests of the low hills on the inside desert.
- 13) Biologically viable acreages of the Sagebrush Steppe and the Salt Desert shrub ecosystems should be preserved.
- 14) Where vegetative manipulation is performed, sensitivity to prevent straight lines at the edge of reseeded and firelines should be present.
- 39.11 15) Personal experience has shown me that monoculture reseeds (usually of crested wheat grass) tend to be biological wastelands. Even the ubiquitous jackrabbit shuns them. Could not one or two additional species of grass or forb be added to the mix to increase the mammalian density and diversity?

Sincerely,



Randall J. Morris

U.S. ENVIRONMENTAL PROTECTION AGENCY

REGION X

1200 SIXTH AVENUE
SEATTLE, WASHINGTON 98101



REPLY TO
ATTN OF

M/S 443

AUG 3 1982

Martin J. Zimmer, District Manager
Boise District Office
Bureau of Land Management
3948 Development Avenue
Boise, Idaho 83705

RE: Bruneau-Kuna Grazing EIS

Dear Mr. Zimmer:

The Environmental Protection Agency (EPA) has completed reviewing the Draft EIS on the Grazing Management Plan for the Bruneau Resource Area in southwest Idaho and Nevada. The Draft EIS provides a generally adequate discussion of the environmental consequences of the alternative grazing management plans being considered by the Bureau of Land Management (BLM). A few elements of the environmental analysis might be improved for the Final EIS, as discussed below.

Water Quality

40.1

The discussion of existing water quality (page 3-13) uses the diversity of stream macro-invertebrate populations as an indicator of long term water quality conditions. Although this is a reasonable measure of water quality, other measures should be included for a proposed action with as significant a potential for water quality impacts as this one. Specifically, existing chemical quality of potentially affected streams, in relation to the water quality standards for these streams, should be discussed. Data should be provided for the following water quality parameters: dissolved oxygen, nutrients, suspended sediment, total dissolved solids, fecal coliform, and water temperatures. If water quality standards are not being met, the Final EIS should provide information on the probable causes and available mitigation.

40.2

40.3

Similarly, the discussion of the alternative management plans should be expanded to determine whether each alternative management plan could cause or contribute to violations of water quality standards.

Analysis of Alternatives

The Draft EIS considers a good range of alternatives and its evaluation of these alternatives is generally adequate. However, the benefit/cost (B/C) analysis within that evaluation appears to have one omission which could produce misleading results. It does not attempt to assign a dollar value to the fish and wildlife supported by the habitat in the planning area. These resources receive substantial recreational and commercial use and therefore have significant economic value. Differing levels of grazing result in differing fish and wildlife population levels and therefore different economic costs would result from the alternative grazing management plans. Standard techniques have been developed by the U.S. Fish & Wildlife Service and others for estimating these types of costs, and these techniques are used routinely by the Corps of Engineers and the Bureau of Reclamation in their B/C analyses for water resource projects with recreation benefits. A similar evaluation would be appropriate for the Final EIS's B/C analysis.

Finally, the Draft EIS' analysis of alternatives clearly indicates that Alternative #4 would produce better results, in most respects, than other alternatives, while providing for a 28% increase in actual grazing over current levels. The Final EIS should provide an expanded discussion on alternatives to clarify the reasons for selecting another alternative.

Based on our review we have rated this Draft EIS LD-2 [LD: lack of objections; 2: insufficient information]. We appreciated the opportunity to review this document. Should you care to discuss our comments and suggestions please contact Mr. Dick Thiel, our Environmental Evaluation Branch Chief, at (FIS) 399-1728 or (206) 442-1728.

Sincerely,

John R. Spencer
John R. Spencer,
Regional Administrator

cc: Idaho Operations Office

40.1 In addition to the macro-invertebrate information, a water chemistry and bacterial analysis was accomplished. Samples were collected at 58 stream sites in the Bruneau and Kuna Planning Units. This data is shown on the Unit Resource Analysis Table 11 located at the end of the comment and response section

Three waters within the EIS area have specified use designations established by the State of Idaho. These are the Owyhee, Bruneau and Snake Rivers. The Snake River was not anticipated to be impacted by the proposal or alternatives. Other waters within the area have no specified use designations; they are unspecified waters.

Specified designated uses for the Bruneau River include primary contact recreation, cold water biota, secondary contact recreation, agricultural water supply, and salmonid spawning. This water appears to meet the State's standards for the above uses for all those parameters measured.

Specified designated uses for the Owyhee River include domestic water supply, agricultural water supply, cold water biota, salmonid spawning, primary contact recreation, and secondary contact recreation. This water appears to meet the State's standards for the above uses for those parameters measured.

All of the water samples except 2 taken on unspecified waters appear to meet the State's standards for secondary contact recreation. One of two samples taken on Syrup Creek and one of five samples on Sheep Creek exceeded the State's limitation for fecal coliform.

40.2 High fecal coliform counts are attributed to high concentrations of livestock on particular stream sites. The proposed action and alternatives 3 and 4 propose special fisheries management practices (including fencing) on 12 miles of Sheep Creek and 2.3 miles of Syrup Creek (Map 2-1). These measures would result in a significant improvement of water quality on these streams.

40.3 Projected changes in water quality with the proposed action and alternatives included impacts to fisheries from changes in suspended solids and turbidity, total dissolved solids, dissolved oxygen, pH, temperature, alkalinity, and coliform counts. The improvement in the parameters as a result of the proposed actions or alternatives is shown in the draft EIS on Tables 4-4, 4-10, 4-15 and 4-24. Impacts from changes to the heavy metal groups are for the most part stream specific and were not included on these tables.

40.4 See Response No. 21.10.

40.5 See Response No. 37.2.

IDAHO STATE HISTORICAL SOCIETY
610 NORTH JULIA DAVIS DRIVE BOISE, 83702



41

August 9, 1982

Mr. Ted Milesnick
Bureau of Land Management
Boise District Office
3948 Development Avenue
Boise, ID 83705

Dear Mr. Milesnick:

Below are my comments on the Bruneau - Kuna grazing EIS draft. I discussed these with Margaret Wyatt.

The BLM class III archaeological inspection procedures should be mentioned on page 2-13, in section 4 of Standard Operating Procedures. These are the specific procedures the BLM follows before the construction of range facilities.

The citation to 36 CFR 800 is too general to be of any value. This is especially important given the conclusion on page 3-15 that by following the standard operating procedures no significant impacts to archaeological or historic sites would occur.

We note on page 2-10 that 125 spring developments are planned in the area. Since prehistoric archaeological sites are frequently associated with springs, these spring developments may potentially affect significant prehistoric sites. Standard operating procedures require the BLM to inspect each spring for archaeological sites, evaluate the significance of any sites located vis-a-vis the National Register of Historic Places, and consult the Advisory Council on Historic Preservation concerning any effects on significant archaeological sites.

In order to avoid delays in projects, we suggest the development of mitigation alternatives in advance between the BLM, the Idaho SHPO, and the Advisory Council. Such agreements have worked successfully in the Challis range improvement program.

Mr. Ted Milesnick
Page 2
August 9, 1982

If you have any questions concerning our comments, please contact us.

Sincerely,

Thomas J. Green
Thomas J. Green
State Archaeologist
State Historic
Preservation Office

cc: Margaret Wyatt

TG/kh

41

- 41.1 The standard operating procedures have been changed in the revised description of the proposed action to reflect your comments.



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NATIONAL CATTLEMEN'S ASSOCIATION

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July 1, 1982

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BRUNEAU-KUNA GRAZING E.I.S.

REMARKS ON THE DRAFT STATEMENT

My name is Tom Olsen and I reside at 4720 Rowell Drive in the City of Boise. I am the Vice President of the Idaho Cattle Feeders Association and I am employed by the Land and Livestock Division of the J. R. Simplot Company. In my position I am responsible for the nutrition and performance of cattle in the company feedlots in Idaho, Oregon and Manitoba, Canada.

Following my graduation from the University of Idaho where I majored in animal science and a minor in range management, I worked for the Bureau of Land Management as a Resource Management Specialist from 1970 until 1973.

I appreciate the opportunity to comment on the draft proposal of the Bruneau-Kuna district as I am quite familiar with the entire area. I worked in the area when the well in the Little Jack's Creek area was drilled.

I am deeply concerned about a number of items in the statement and about the pipeline and water development program for the Jack's Creek area. I will elaborate on a number of points.

In the list of preparers, pages L 1, 2 and 3, there is a list of 17 individuals. It indicates that 12 of these individuals have related degrees in range, wildlife or forest management. In the entire document I find no reference to wild horses, to the damages they are capable of doing to the ranges, of any plans to control these animals or to what extent the extensive fencing and cattle guards would help to control these creatures.

The wild horse is an introduced species without natural enemies. The horse is protected by Federal law as a responsibility of of the BLM. The agency has conducted round ups of these animals from time to time which lets us all know that the agency is aware of their presence. Your neglect to mention these animals puts a serious cloud of doubt over the entire document.

Page 3
Bruneau-Kuna EIS
July 1, 1982

Page 2
Bruneau-Kuna EIS
July 1, 1982

I regard the entire area as a great asset to the State of Idaho and that we must develop its full potential. There can be no doubt about the abuse the land suffered one century ago. There has been a slow improvement in the resources of the area since the adoption of the Taylor Grazing Act and the development of the Range Management Sciences.

I disagree with the statements under ENVIRONMENTAL CONSEQUENCES of page iii relative to the adverse impacts upon the bighorn sheep by the construction of the Jacks Creek pipeline. Bringing more water into any part of an arid resource area will benefit all life forms, both domestic and wild.

To the southwest of this area in the Paradise Valley area of Nevada it has been well documented that the adoption of an effective rest rotation grazing system increase the cattle carrying capacity of the ranges. Further, members of families that have lived in the area for 3 generations noticed that this better range management system resulted in the return of bighorn sheep to the area. This has been well documented on the Les Stuart range, a show place for the University of Nevada for range management students as well as for representatives of various environmental groups.

Protection for the sage grouse is only possible through a ban on hunting these birds. Any good hunter knows that they come to water around mid day. The place to hunt is at the streams and water holes. Being a slow moving, poor flying bird, they are highly vulnerable to the lead poisoning expelled by a shotgun. Dispersing the water supply would give them a better chance for survival. Adding feeder lines from the Jacks Creek pipeline would enhance their survival chances.

On this same page the document discusses years of below normal vegetative production and the impact of livestock on the prey base of the birds of prey. This idea is a linear projection of the whole birds of prey issue calling for great amounts of land dedicated for this prey base.

Farmers in the Kuna district and other areas adjoining the undeveloped lands wage a continuing war against the invasions of the Townsend ground squirrel. Critics of the Birds of Prey plan have repeatedly suggested that the BLM could do quite well by insuring the base against adverse weather years by cultivating a base for this prey. If the squirrels will readily move into well cultivated farm ground, then they would certainly thrive on special fields planted, watered and reserved for their life style. These of course should be isolated and in a number different locations.

I feel the subject of visual resources is exaggerated. One must get rather close to a fence to see very much of it. I would invite you to admire the foothills and mountains in back of Boise. They are very colorful in the various angles of sunlight during the day, the colors change during the year and they are a glorious sight. One does not see the fences, bike trails and other man made objects that cover the area. They look today as they did to the pioneers on the Oregon Trail as they passed this way.

42.5 On the bottom of page iii, the draft anticipates an increase of 132 jobs in 20 years. I find it hard to determine the economic reasoning in the draft statement. On page 3-19, the document refers to regional employment of 13,961 in the year 1979. This is a nice figure. f It must be right out of the blue because the 1980 census for Owyhee county is listed at 8,272. The total Idaho population is shown as 943,935. The economic picture can change so rapidly in this country that any job projection can only be classed as a wild guess or a myth.

If we do develop this resource through increased forage, added water points and proper rotation of pastures, there is no doubt that we will increase the game available for sportsmen.

I have looked at the figures for three different sizes of cattle operations on pages D 3, 4 and 5. As I calculate the figures, the draft is referring to the following size units:

	D-1	53 Cows	D-2	243 Cows	D-3	1,231 Cows
Cattle Sold						
Steers	23		91		453	
Heifers	16		57		282	
Cull Cows	6		28		141	
Production	45		176		876	
Production %	84.91%		72.43%		71.17%	

Long range production figures of the U.S. cattle herd will indicate that for every 100 cows, 83 cattle and calves go to slaughter.

When slaughter figures are above 83%, the herd is in a liquidation phase such as occurred in the years of 1976, 1977 and 1978 when total slaughter exceeded a number equal to 83% of the total cows.

When this slaughter is below 83%, then the herd is expanding such as it was in 1969 through 1974 when total slaughter figures were well below 83% of total beginning cow numbers on January first of each year.

42.7 WHERE ARE THE BULLS? Are these herds using artificial insemination?

42.8 The figures would indicate that D-1 is very efficient and that D-2 and D-3 are indeed under poor management. These are poor figures for making economical projections.

Or else they would indicate that running cattle on the BLM ranges is a poor proposition.

Social conditions and social well being gives one a whole new world to ponder. Ranchers I have known are generally happy when they are making money. This reflects in a more active social life and a better outlook on his world.

There is a way to express social well being that should be emphasized. The best thing we can have on our public lands are people living out there and taking care of the land. If that rancher has a sound working partnership with the BLM and its personnel, he will be happy.

What is needed is a program that will encourage the livestock operator to improve the range. In so doing he will improve it not only for his own cattle and economic gains, but he will improve the wildlife habitat, the vegetative cover and subsequently the recreation potential of the resource area.

Conversely, if he lives in fear of losing his allotment, which is a part of the dollar value of his home ranch, then his social well being, to use the term, will be miserable. This is the kind of malcontent that spawns Sagebrush Rebellions.

CONCLUSION Through my experience and observations of our cattle operations, I feel strongly that we should disperse the water in every possible way. This will disperse the livestock and improve the vegetation. This will improve their breeding efficiency.

A few water lines could leave temporary scars that could reduce the "visual resource". But this would be more than offset by the thrill of observing more deer or sheep or sage grouse. Just looking at the land is not very exciting. But how exciting it would be to return from a trip to the area and report the sighting of bighorn sheep and deer. I think this trade off favors sighting the game.

Everyone must realize that as nature evolved over the centuries, the hoofed animals were given an important place in the scheme of things. Their place in nature is to grind the seed into the ground to insure a future crop of vegetation. The hoofed animals are not predators, therefore they are prey. They are not vicious. Man has added to their importance to the land as he has come to understand their proper role in the reseeding process, in doing this before the birds and rodents eat the precious seed that is so vital to the next generation of vegetation.

I am happy to see the Boise District moving ahead with a plan to further develop the potential of this great resource.

John E. [Signature]

This letter was presented as testimony at the public hearing on July 1, 1982. It is being responded to in letter form because it contains comments that were not orally presented.

- 42.1 To the best of our knowledge, wild horses have not in the past or are not now present within the EIS area. Since current regulations prohibit establishing them in new areas, the impacts to wild horses will not be addressed.
- 42.2 Water developments are generally beneficial to wildlife. They provide water which disperses use and often makes unused habitat available. Sage grouse and antelope may benefit from the proposed water system. However, in the case of unwatered areas for cattle in bighorn range, water development also brings unwanted behavioral interactions with cattle. Such interactions would result in avoidance of their habitat, due to fear of and aversion to cattle (Trefethen 1975). An adequate water supply is currently available to bighorn from Little Jack's Creek.
- 42.3 According to the Winnemucca District of the BLM and the U.S. Forest Service, the Less Stewart Range does not have any bighorn sheep on it nor does it have potential for introduction. In 1979, the Nevada Department of Wildlife and the U.S. Forest Service introduced California bighorn sheep to the Santa Rosa Mountains. The sheep were transplanted north of the Less Stewart Range Allotment.
- 42.4 It is recognized that from a distance fences and smaller man made objects are not visually obtrusive. However, they do create adverse visual impacts when viewed from a closer range.
- 42.5 See Response No. 7.2.
- 42.6 The regional economy analyzed in this EIS included Owyhee and Elmore Counties. Data from the Bureau of Economic Analysis showed 1979 employment of 3,314 and 10,647 for these counties respectively for a total of 13,961.
- 42.7 Bulls are depreciated and therefore not shown under sales. The procedures used in developing the ranch budgets are in "Estimating Economic Impacts of Adjustments in Grazing on Federal Lands and Estimating Federal Rangeland Forage Values". This was written by C. Kerry Gee and issued as Technical Bulletin 143, Colorado State University Experiment Station, Fort Collins, Colorado, November 1981.
- 42.8 The data in the ranch budgets reflects information gathered and/or verified in a meeting with Bruneau/Kuna permittees.

Frank Bachman - Battle Creek and Northwest Allotment Permittees

Comment 43.1: ... none of the alternatives or the proposed action meet the needs of a sound multiple use management plan for Owyhee County.

We will present to you a fifth alternative which we think provides a better balance between all resource demands. Under our proposed alternative livestock use would be increased on two allotments.

We do not propose to maximize livestock numbers; rather, we propose to increase numbers on two allotments where forage is presently available and needed to meet the objectives of a sound allotment management plan.

Alternative five would include the major objectives of the proposed action as outlined in the ES document. Our proposed alternative would also include additional AUMs of forage available for livestock use on the Battle Creek and Northwest Allotments ...

To accomplish the objectives in making available additional forage, the Jacks Creek Pipeline must be constructed as originally planned, including the 19 miles of main line and the 22 miles of lateral line.

We are assuming that Big and Little Jacks Creeks wilderness study area will not be designated as wilderness ...

The final point of our alternative five deals with vegetative allocation. The Bruneau EIS determined the amount of forage available based on proper use factors or as stated in the ES, the biological limit.

The ES goes on to say that the biological limit was used because the Bruneau Resource Area has not identified specific grazing systems. We are unanimously against this approach.

The Owyhee EIS, which was completed prior to this, based their vegetative allocation on 50% utilization of grasses. Most of the Owyhee area at that time did not have grazing systems developed.

The next step following the ES is the development and revision of AMPs.

... Most of the allotments in the Bruneau Resource Area as in the Owyhee Resource Area will have AMPs developed in the future.

Operating under a well written AMP, 50% utilization would be a very acceptable method for determining stocking rates.

Response 43.1: An additional alternative, based on 50% utilization levels, was considered. This alternative was not included in the Final EIS because utilization levels of 50% would exceed the livestock grazing capacity and could not be allowed according to current grazing regulations (43 CFR 4120.2-1). The basis for this determination is that

the east, a very suitable habitat. This eastward movement has not occurred.

Lack of water between the two canyons could be the only explanation. We have spent more time with these bighorns than probably all of the people here this evening, including the Bureau people. We've observed cattle and sheep grazing together and we have also watched sheep drinking from stock ponds we constructed ...

... Through our close contact with the sheep, we feel that we can as a group predict the outcome better than anyone. Under proper grazing management and with the development of additional water, the sheep population will not only maintain the 100 plus head which presently exists, but will continue to increase and begin using Big Jacks Creek.

Response 43.2: Construction of the entire Jacks Creek pipeline would bring intensive cattle use onto the plateau lands adjacent to the Little Jacks Creek canyonlands. Two conflicts are predicted based on research in other areas as well as observations of both the Little Jacks and the Owyhee River bighorn populations. The first conflict would be for forage. The two species have very similar food habits. If forage degradation can be avoided then this conflict is avoided.

The more significant conflict created by the water development is the increased disturbance to bighorns by cattle and people on the plateaus adjacent to the canyon. These areas are currently used by the bighorns. At least four research studies in other areas (Russo 1956, Wilson 1968, Irvine 1969, and Dean And Spillett 1976) have documented that the presence of cattle will cause the bighorns to avoid an area, at least while the cattle are present. Our observations of the declining populations above the Battle Creek canyonlands, in the presence of heavy livestock use, leads us to conclude that this heavy use is the cause for the loss in the population.

Our experience with pipelines indicates a high degree of maintenance is required. Vehicle access is a necessary part of pipeline maintenance. Consequently, human use in bighorn habitat would result from both maintenance personnel and the improved access would attract other people into the area.

All three of these factors (increased forage consumption, social conflict between cattle and bighorns, and human disturbance) are predicted to cause bighorns to avoid a large part of their habitat. The shift to avoid the pressures brought by people and livestock would create an overcrowding situation in the remaining suitable habitat, ultimately resulting in a reduction of the population. Since this population is considered to be at the lower limit of biological threshold, significant losses would likely result in the loss of the entire population.

Sightings of bighorns east of Little Jacks are common. Twenty-three percent of our 597 sightings of bighorns were made on the east side. Although our data indicates more use on the west side than the east side, the lack of water on the east side is not considered the responsible factor. The greater amount of cliff habitat on the west side than the

without specific grazing systems which are designed with adequate rest or deferment to satisfy plant growth requirements, 50% utilization levels would exceed the capacity of the vegetation to maintain or improve. Grazing systems were identified in the Owyhee EIS area prior to the forage allocation process. The forage allocations were based on a known level of grazing deferment or rest, and therefore could support a higher level of forage removal. Since grazing systems have not yet been identified on the Bruneau and Kuna Planning Units, this level of use is not appropriate.

Clipping studies by Cook and Stoddart from 1955-61 on typical desert range in west-central Utah, concluded from these studies that desert plants can be grazed in late spring only if herbage removal is 30% or below. Utilization of 50% or more, during this season, was extremely detrimental. These studies also concluded that forage removal during the winter and again in the spring could not exceed 30% in any one season, if satisfactory range conditions were to be maintained.

Studies by Tom Daer and E. Earl Willard also showed that harvesting less than 50% of current herbage production is necessary to retain vigorous bluebunch wheatgrass plants.

Utilization data which is being collected during the spring and early summer periods in the Owyhee Resource Area and is being used to limit livestock use to 50% levels, probably results in similar stocking rates during the spring and early summer as would the forage allocation procedure used in the Bruneau and Kuna Units. This is because the total annual production of plants has not been achieved when utilization studies are conducted. Fifty percent use during the spring period, may represent only 30-40% use of the total annual production. The forage allocation levels during the late summer and fall are very similar under both methods of allocation because plant's maintenance needs have been satisfied by this time.

Comment 43.2: There has not been any major conflict between the sheep and livestock since their introduction a number of years ago. The cattle and sheep presently use much of the same area, and sheep numbers continue to increase.

Hunting is allowed on this bighorn herd and recently Idaho Fish and Game captured animals for transfer into Nevada. All of the sheep movement following introduction has been to the west of Little Jacks Creek.

This area west of Little Jacks Creek is used much more by livestock than those areas proposed for the pipelines. Cattle and sheep occupy this area continually and with no apparent conflict.

In fact, probably the most important reason for this westward movement is water located on the plateau, water which was developed for cattle.

Originally when the sheep were planted in Little Jacks, BLM and Fish and Game figured it wouldn't be long before sheep moved into Big Jacks to

east side provides more area of suitable habitat to bighorn. We believe that ample water is available to the bighorns within the canyon.

Randall Morris - Self

Comment 44.1: The economic value of bighorns must be considered, both in the existing herd and the potential loss in Big Jacks Creek. A full benefit cost must be done as well as a full environmental impact statement.

Response 44.1: See Comment No. 37.11, 3.1 and No. 3.2.

Daryl Keck - Glenns Ferry Grazing Association

Comment 45.1: It states that there is 278 miles of area and fence that has to be built to implement this, and knowing the cost of building a mile of fence now, that's quite a figure, and I question whether economics is there for the cost that's going to be, to the benefit it's going to be on these streams and ponds.

Response 45.1: A benefit-cost analysis would be done on all projects prior to their construction.

Comment 45.2: And if you put these fences in to fence the cattle off, there is going to be quite an expense of putting them back; and you can see, in fact, every one of these canyons the high water mark is higher than the head on the horse, so I know these fences wouldn't survive.

Response 45.2: Most fences would be placed along canyon rims and not near the stream's high water mark. Therefore, maintenance problems would be reduced

Bob Collett - Castle Creek Allotment

Comment 46.1: There is one instance in the draft I would like to point out. If I read it correctly, there is at least one rancher with over 500 head unit that is taking in the neighborhood of a 50% reduction on a large number of AUMs, the negative impact on this only showed about \$1,000. I hope that not all the financial impacts are shown in this perspective or we as ranchers are in trouble.

Response 46.1: The average annual income change per permittee in the 500 head category (Owyhee portion of the EIS) is -\$13,971 (EIS Table 4-6).

Comment 46.2: The riparian zones as shown on the maps are bound to cause some disruption and hamper the natural drive of cattle in some of these areas and could create a more adverse impact on the land than what little good some of the fenced riparian zones could be.

Response 46.2: Because most fences would be located along steep canyon rims only cattle movement into the canyons would be affected. It is felt that natural drift between most use areas would not be significantly affected.

Comment 46.3: The cattle seem to receive all the blame for lack of numbers of sage grouse. I saw no mention of what I consider its greatest enemies, and that is the coyote and the eagle.

Response 46.3: Coyote and eagle predation on sage grouse is recognized. However, it is felt that habitat condition is the primary factor affecting population levels.

Comment 46.4: I have lived and operated on this range within the Castle Creek Allotment for the past 32 years. In that time there has been several changes in our operations and range conditions. I would say our allotment for the most part is in an upward trend of plant improvement and ground cover.

Response 46.4: Appendix Table B-6 indicates that a large portion of the Castle Creek Allotment is in an upward trend.

Comment 46.5: It is stated that when Ant Hill Pipeline System is activated it does not have enough water to take care of all the lines at one time so only part of the lines are activated at a time and then shut down when the other lines are turned on, thus leaving the wildlife that are established on the first lines without water. This is completely false. All lines are activated at the same time and for all summer on Ant Hill.

Response 46.5: This statement was in error and it has been deleted. See text change section.

Gene Davis - Self; Bruneau Cattle Company

Comment 47.1: I note that it's under the assumptions of your plan that there are no management plans in the area, very few management plans, and because of this you feel this (biological limit level of allocation) would be the better way to go.

We refute this. We think there are management plans. We know that we ourselves and our associated users in the Battle Creek Allotment have utilized it for grazing, rest, and the whole bit, and along as near as we can do with the management plan under which we operated for two years prior to being pulled away from the plan, ... it was in the AMP that we were going to construct 43 miles of pipeline, and that's the pipeline that you refer to in your EIS as being "unpalatable" to your way of thinking.

We think it's a must to live up to the contract that you signed and to really give you fellows a chance to continue to operate and manage that forage or that resource in the best manner possible.

out of business, their private lands would not go out of private ownership or off the tax rolls.

Guy Coyler - Coyer Cattle Co.

Comment No. 49.1: The Battle Creek Allotment has operated under an allotment management plan since May of 1969 when it was signed in good faith by the permittees and the Bureau.

We are presently working within that framework of that plan with the portion of the rest-rotation program and with the completion of the Jack's Creek water system, we can implement the remainder of that program as spelled out in our AMP.

Therefore, it is imperative to allocate the forage on the fifty percent utilization levels as was done in the Owyhee portion of the studies.

Response 49.1: See Response No. 47.1.

Comment No. 49.2: Throughout this draft it was stated that the cattle and the bighorn sheep are in competition. This statement is false. A true statement is that people and sheep are in competition. Within the promotion of a wilderness area, it can only be detrimental to the bighorns. An influx of people, whether backpackers, campers, fishermen or hunters, has never been beneficial to wildlife.

The facts and figures in the draft as well as common sense clearly points out that the cattle and bighorn sheep do prosper when in close proximity. The sheep in the Little Jack's Creek have multiplied from twelve head in 1967 to their present one hundred plus. This is a terrific growth rate considering that in 1967 there were many critics in the BLM and the Fish and Game Department that felt that bighorns would never prosper in this area.

When you survey the map on page 2-5, it clearly shows that this increase in herd numbers has been largely accomplished in the area of cattle grazing, and they have migrated towards the cattle and not away from them.

A logical explanation would be that man made reservoirs provide water on the west side of the canyon and no water is available on the east side. It has also been our observation that there have been more sightings of sheep on the west side, which is currently the largest cattle use, and the map confirms this.

All these facts clearly prove that cattle and bighorn sheep do mix.

Response 49.2: A significant increase in people use of the Little Jacks bighorn habitat, for whatever reason, is considered to be detrimental to the continued survival of bighorns in this area. Wilderness designation would attract more people, but use can be controlled through the permit process.

Response 47.1: The biological limit was used because there are no allotment management plans in operation that use a rest system or a deferred system until seed ripe. To allocate use based on 50% of a plants full growth, especially in the spring when only 25 to 50% of its growth has occurred, would be an over allocation and detrimental to the range. Although any range survey has problems, we feel confident that the range survey we completed and the subsequent allocations are adequate and correct.

The management plan on Battle Creek Allotment was reviewed for adequacy in 1974 to determine whether to continue with the plan or postpone it until after the grazing EIS was completed in accordance with the NRDC suit. The plan was found to be inadequate in several respects, one of which was the plan contained an area actually within the Northwest Allotment. The AUMs in Horse Basin were figured as available for use by the Battle Creek Allotment users to make the system as outlined in the plan work. It is also recognized that the Battle Creek pipeline (full 41 miles) was an integral part of that system. The decision was made not to continue installation of the pipeline until after the environmental impacts were addressed in the grazing EIS, which is where we are today.

As much as we would like to think that we know all the answers, the facts are that any plan must be somewhat flexible and be adjusted as more data become available.

Comment No. 47.2: I think it's (sheep transplant) been highly successful and there is not a person who is a native of that area that is familiar with that area that doesn't recognize that those sheep have grown and expanded on the side where the cattle and where the water is, not to an area that you suggest if we would water with the pipeline, forty-three miles of it, would be detrimental and even possibly eradicate the sheep herd in Little Jack's Creek area.

...We think there is no exception with cows. We see them continuing to graze together and we think that the gang at the Bureau probably has seen this too. I have a friend down in the breaks of the Owyhee. Sheep are now coming into the field down in that area. This is on the Oregon side, and they are detrimental to this man's cropping system on his farmland, and I know this man well enough to know that when he ran them off the first time, it might have been easy, but the second, third, fourth and fifth time it wasn't easy, and if there is going to be upset by cows in the area, certainly they would be by human harassment. It's tough for him to keep them out of the field and detrimental to his crops.

Response 47.2: See Response No. 43.2.

Oon Davis - Self; Owyhee County Commissioners

Comment No. 48.1: Some of the proposed cuts greatly reduce the tax base of Owyhee County.

Response 48.1: It is not anticipated that the proposed action or alternatives would affect the tax base. Although some ranchers may go

Development of a pipeline to water livestock in bighorn habitat is also considered detrimental to bighorn. Research (reviewed by Jones 1980 in: *The Desert Bighorn*, Univ. of Arizona Press) has demonstrated that bighorns avoid areas occupied by cattle. It is recognized that, individuals or groups of bighorns may deviate from this behavioral trait but management must be geared to the entire population.

The pipeline will be accompanied by a service road. As a result additional people will frequent bighorn habitat. Controlling people use will be very difficult after roads are constructed.

Although our data indicates more bighorn use on the west side than the east side, the lack of water is not considered to affect bighorn distribution. The greater amount of cliff habitat on the west side compared to the east side provided more suitable areas for bighorns.

Also see Response No. 43.2.

Rayola Jacobson - Idaho Farm Bureau

Comment No. 50.1: I must take exception to your statement on bighorn and cattle not being compatible. We have known for years that they were compatible, and not one week ago there were four head of bighorn sheep on the head of Poison Creek with a herd of about twenty cattle.

The only reason that we knew the sheep were there is because when we drove over to check the cattle, the sheep jumped up and took off over the hill.

As Mr. Coyer so very well stated, sheep and cattle are compatible. Sheep and people are not.

Response 50.1: We do not question that individuals and groups of bighorns may associate with cattle. Your observations as well as those of biologists have noted this occurrence. However, to judge compatibility by a few observations could lead to an incorrect conclusion. At least four research studies (Russo 1956, Wilson 1968, Irvine 1969, Dean and Spillett 1976) have addressed this question and have documented a general avoidance reaction by populations of bighorns. Our own data tends to support these research findings. During the last six years we have made a large number of observations of bighorns in the Little Jacks area as well as along the Owyhee River. We only have one observation of six rams near cattle. Also see Response No. 43.2 and 49.2.

Alan Hausrath - Idaho Environmental Council

Comment No. 51.1: I looked in the draft document and saw a variety of benefit/cost ratios calculated for the variety of alternatives, but it appeared to me that in some respect -- there is suspect benefit/cost analysis in that the benefits and costs for the taxpayer are lumped together with benefits and costs for the users of the land and combined to make a joint benefit/cost ratio.

Response 51.1: The purpose of benefit-cost analysis is not to determine the costs and benefits for the general taxpaying public but rather to identify all benefits and costs, to whoever they may accrue. The question of equity, who is paying the costs and who receives the benefits, is not within the realm of benefit-cost analysis.

Ray Blair - Glenns Ferry Grazing Association

Comment No. 52.1: I know the Sunnyside District and the Owyhee District outside of the Bruneau River drainage fairly well, and the comments on the bighorn sheep, I have to differ with these people here and maybe even you that the cattle and sheep are not going to get along together.

I don't know where you got that experience, but our experience is on Deep Creek, from the head of Deep Creek down to where it joins the east fork of the Owyhee is our boundary, we have cattle with sheep.

They don't bother each other. I'm not saying sheep with sheep. Domestic sheep with sheep would bother each other. It might bother each other, but they complement each other and that band of sheep has not only been on Deep Creek, it's been down through our fields and around on Juniper Mountain, up to Nickel Creek, and they seem like they want to settle now down in Black Canyon and Deep Creek in the east fork.

Now, if you're having trouble with sheep and they're not producing, there is two things that's involved: Man who disturbs the sheep or predators who eat the sheep.

Response 52.1: A small loss of bighorns to predators is expected. This though has not hindered the reintroduction of bighorns into suitable habitat. Bighorns are able to counter most predator threats with their exceptional eyesight, climbing ability and habitat of feeding and resting in open areas adjacent to or within rugged terrain. See Response No. 43.2, 49.2 and 50.1.

Gene Davis - Self; Bruneau Cattle Company

Comment No. 53.1: I'd want to comment on one technical item to me that I just can't understand in the EIS, and this will concern the Center

There is no question in our minds that the effect of a curtailment would be severe, not only on the individual producers impacted directly, but also on the enterprises that livestock producers rely on and sources of needed foods and services; from the farmer who sells feed in pasture to the feedlot operator who also purchases feed as well as cattle, to the main street business that trades with range livestock operators and their families and employees.

It may be argued that businesses would survive and that tax base may survive, but there is no question that this scenario involves a certain amount of pain for everyone involved. We believe that the EIS draft does not fully address the economic impact that some of the environmental statement proposal would entail.

Response 55.1: The secondary impacts of the proposal, which includes the use of multiplier factors, are described on pages 4-20 and 4-21. Since the overall change in rancher income would increase (Table 4-6, page 4-19) as a result of an overall increase in proposed livestock use, the overall affects would be beneficial.

Bill Lawrence - Boise State University Conservation Group

Comment No. 56.1: I'd like to just cite a few research projects, some research that I've been doing and some others that I've come across, and these are dealing with some native vertebrate populations.

In 1980 I completed a study north of Boise in a high desert habitat, and what I was comparing was heavily grazed communities versus lightly grazed communities and these also included the grazing incurred at different times of the year, the heavy grazed areas in spring, which can't have a more deleterious effect.

Anyway, I found highly significant reductions in perennial grass species, native grass species in native areas and also correlated with heavily grazed areas was a major increase in introduced grass species such as cheatgrass and Medusa head rye, and then also correlated with this grazing were very significant reductions in both the density and the species diversity of small mammals; mostly small rodents, although some insectivores.

I might also cite a paper or study that was done by a fellow that I work with, Dr. Timothy Reynolds, and in his Ph.D. thesis at Idaho State University he found -- his paper entitled, "The Response of Native Vertebrate Populations to Different Land Management Practices," and this was done at the INEL site.

He found, and he was studying primarily areas that had been planted with crested wheatgrass and also grazed areas, that there was a significant reduction in small mammal density and species diversity as I had found, and he also found that heavy grazing on crested wheatgrass significantly reduced bird species; birds that were breeding on the INEL site.

Allotment. You indicate that the trend of that allotment, the forage, available forage, comes out at 167 percent of the allocated use.

This is way and above where it was ten years ago, and we think we know why it's there. We think we've managed properly, but in the EIS it indicates what the trend might be, what is the trend in that area as it does all the other allotments.

The trend there is either downward -- and I think it's downward. Yes. 17,661 acres, nonapparent, and to me nonapparent would mean, hey, we don't know. It's status quo. 105,937, and none of it upward, and still within an increase of usable grazing capacity. 167 percent of demand.

It --- I have talked with some Bureau folks on it and they have not had time to make trend studies. That takes seven, ten years. I'm not sure, but quite a length of time. This I understand, but I think it's very misleading to the general public, and when they come out with omissions like these as to the trend and only because they don't have time, and that's understandable, but it's again misleading, and I think it's something that should be cleared up.

Response 53.1: The present apparent range trend figures listed in Appendix Table B-6 on page B-8 were based on our best professional knowledge and judgment of each allotment. We do not have trend studies established in the Center Allotment, thus have no data base from which to draw more accurate figures. Increased production estimates on the allotment do not necessarily indicate that range trend is upward. Seedlings which have been developed on the allotment or unknown factors could account for the apparent increases in forage production.

Russell Heughins - District 3, Idaho Wildlife Federation

Comment No. 54.1: On the economic analysis, I find no reference to wildlife and recreation. I see plenty of the economics of the livestock; however, I see nothing about the contributions that the recreationists, specifically hunters, make to the economy of Idaho, and as one of those, I can tell you it's substantial.

Response 54.1: See Response No. 21.10.

Comment No. 54.2: The same problem also exists on the social analysis. It omits any reference to recreational considerations, especially in the light of the growing population in southwestern Idaho.

Response 54.2: See Response No. 28.5 and 34.3.

Eric Davis - Owyhee Cattlemen's Association

Comment No. 55.1: It is not easily documented what the domino affect would be on the local county and state economics if livestock use of the federal range lands in this area were to be curtailed to any degree.

Really, there is a plethora of research which backs up the statements I'm making right now.

The Reynolds paper was published in this INEL study. In another conference that I recently attended, the National Meeting of the American Society of Mammologists, there were a number of papers presented that showed the deleterious affects of grazing on native vertebrate populations, especially heavy grazing.

I might cite one here. Dr. LeRoy McClanahan from San Diego State University, found that again very significant reductions in species diversity on heavily grazed areas, and he also found that the one habitat feature which seemed to be most closely correlated with small mammal species diversity is the abundance of perennial plant species, and anyone, again, who was familiar with range management knows that grazing -- one of the first things you seem to lose in heavily grazed areas is the perennial grasses.

Also I might just mention that I'm currently doing a study in Owyhee County on the sagebrush vole (sic) which some people think is -- may even qualify for a threatened species category.

It seems to be very rare any more, and it also appears, preliminarily, it appears that it is closely associated with perennial grasses, so just in summarizing some of the research, I think that there is a fairly strong case that can be made for the fact that heavy grazing can have some rather deleterious affects.

I don't need to remind the gentlemen here that the BLM has mandates since 1964 by the Federal Land Policy and Management Act to manage for a variety of values.

I am not sure that these values have been adequately addressed in the current EIS.

Response 56.1: See Response No. 9.1.

David Lahtinen - Self

Comment No. 57.1: I watch them all summer long, and there is absolutely no basis for the people that are saying that these sheep and cattle can't mix, because they're mixed continually.

The cattle go up from the home ranches in the valleys that's twenty miles from this canyon and they worked their way right up through these plateaus that we're talking about watering, and they work from there in the spring -- this is part of their spring range, they work from this spring range and go on into summer range and then they go right through the heart of this supposed pipeline or proposed pipeline area.

The sheep maintain themselves mainly in these canyons, and in the Jack's Creek Canyon alone, they'll go across to the east towards Shoofly,

and at times we have seen them in Poison Creek, but you do not seem them in Wichahone Creek. They're not there. It's eight miles across there.

There is no water. Once that pipeline was developed, these lines put in, these tanks put in, this would benefit not only the cattle by dispersing the cattle over a greater area and not having them confined in some of our areas that are being hurt.

Then this would also benefit the cattle and the wildlife because the wildlife are going to drink out of these tanks that we put in just exactly like the livestock do, and we've had to maintain these tanks and those springs and these fences without any help from any other group.

Response 57.1: See Response No. 43.2 and 49.2.

Comment No. 57.2: Now, the notes back here in your book a little further say that you state almost in every paragraph the damage that cattle do.

They do the damage to the sheep, they do damage to quail, they do damage to fish. I've been up and down that Jack's Creek all my life, and you can go in the top end of that thing and for the fifteen miles down through that canyon, two steps will put you across that creek.

You can wade that creek in two steps. In fifty feet you can catch fifty trout out of there as fast as you can pull them out. Now, if these cattle were hurting these fish, I don't think you'd have near that number in there. These fish are so thick they'll bite a bare hook, and they're so small -- they're only six to eight inches long and never get any bigger because there is no more feed in there for them fish.

Response 57.2: Our inventory data indicates that portions of Big and Little Jack's Creek are in good fisheries habitat condition with the majority of these streams being in fair condition (Map 2-3). The proposed fencing would allow areas that are being impacted by livestock to improve in condition. This habitat improvement should provide more food for fish currently present and fish size would be expected to increase.

Clet Sellman - Self

Comment No. 58.1: This EIS is based on the premise that the proposed Jack's Creek pipeline would adversely affect the bighorn sheep. This again is not necessarily true.

The fact is that the sheep use this area very little, and I believe that watering the area would open it up to the sheep and enable them to establish a herd in the Big Jack's Creek.

Response 58.1: See Response No. 43.1.

significant improvement in riparian areas can be obtained through grazing exclusion.

Rayola Jacobson - Idaho Farm Bureau

Comment No. 60.1: If you construct fences on these banks, you'll just destroy the fishing, the hunting, and some of the people who go in there rock hunting will be fenced out.

This is a very narrow creek and it will be nearly impossible to hold fences with the stream alteration that occurs here from year to year and season to season.

It will be so costly in the extreme to construct these fences, difficult to construct them at all, and nearly impossible to maintain them.

Response 60.1: See Response No. 45.2.

Comment No. 60.2: What is the ultimate number the Fish and Game hope to achieve in connection with the bighorn sheep? Does anyone know how many they really hope to have there, and what is the ultimate benefit to the community at large? As has been stated here tonight, are they for hunting, are they for viewing or are they simply to be there?

If the ranchers in the area are forced to take a cut in AUMs, is there any guarantee or preference of a reinstatement in the AUMs for the ranchers that must take these cuts?

Response 60.2: We do not know Fish and Game's ultimate goal for bighorn sheep. Several potential areas for future transplant are present in Owyhee County. Based on a plan developed between the Fish and Game and the BLM the following procedures were agreed upon:

- 1) Fish and Game identifies and prepares a habitat suitability analysis of a proposed area.
- 2) If the Fish and Game determines the habitat is suitable, the BLM prepares an environmental assessment which describes the environmental as well as the social impacts.
- 3) Based on public review and comments, including each affected livestock permittee, the BLM makes a decision to allow, not allow or conditionally allow the transplant to take place.

To date, two other areas have gone through this process (South Fork Owyhee River and West Fork of Bruneau River). Both areas were approved as release sites and both have population goals and management constraints.

Bighorn sheep are valuable for all of the reasons stated in your comment.

Tom Blessinger - Self

Comment No. 59.1: I want to bring out one point in regards to the Bruneau-Kuna EIS, the forage allocation proposed action regarding Table 2-1.

In 1979 and 1980, a range line agreement was signed in the southeast allotment. It divided up thirteen permittees. The area was divided up on 101 to 113 percent AUMs on the ground derived from a range survey in 1959. No increase in AUMs were allowed. They stayed at their one hundred percent AUM level, but each was given a larger area to include the AUMs surveyed on the 1959 range survey.

According to Table 2-1 and using the Simplot Field as an example, there was a twenty-four percent reduction.

I point out that in this few year's span that you could have a plus AUM figure go down twenty-four percent, and looking at the range as what I consider myself as a qualified range person, I would say that the AUMs are there.

Response 59.1: This area was resurveyed during 1979 and 1980. This survey, which represents the most current and accurate data available, indicates that the forage production of these allotments to be what is proposed on Table 2-1. Monitoring studies would be established to assess proposed use. If the current survey is, in error, adjustments in livestock use would be made.

Comment No. 59.2: In dealing with the bighorns and their relationship with livestock, I had the fortune to work for the Idaho Cattlemen on the Challis EIS.

We did extensive analysis and survey on the Challis EIS, denoting that bighorn and livestock do work hand in hand.

You'll see them drinking out of the same water holes, eating primarily side by side.

Response 59.2: See Response No. 43.2, 49.2 and 50.1.

Comment No. 59.3: Another point that I would like to bring out is the fencing of the riparian area. This was tried by the U.S. Forest Service in Bear Valley. Several miles of the stream banks were fenced.

Now, we must bring up the point, "Who builds this fence? Who supplies the materials and who does the repair?" This is quite costly. This was proved by the Forest Service several years in advance to the BLM coming up with the right riparian fencing idea, that this does not work.

Response 59.3: The fences proposed to protect the fisheries streams identified in the proposed action would be constructed and maintained by BLM. Since these fences would be located along canyon rims away from the actual stream banks we feel that maintenance needs would be reduced. As documented in the draft EIS numerous studies have indicated that

Population goals and subsequent forage allocations between livestock and bighorn sheep would be periodically reviewed and adjusted as the need arises. However, there is no guarantee that livestock AUM reductions if required would be regained.

Comment No. 60.3: I also question the lack of comment and consideration given to predators. There doesn't seem to be much comment on predators, and we all need predator control.

Response 60.3: See Response No. 46.3 and 52.1.

Table 11. Water Quality Constituents in Streams within the Bruneau and Kuna Planning Units. Results expressed in mg/l unless otherwise indicated.
 * Indicates water quality constituent concentrations which may be limiting to trout populations.

Stream Name	Location T R Sec.	Date	Time	Temp °F	pH	Turb- idity	Dissolved Oxygen	% Saturation	Non-Filterable Residue	Filterable Residue	Alkalinity as CaCO ₃	Hardness	Specific Conductance	Aluminum	Arsenic	Barium	Beryllium	Boron	Cadmium	Calcium	Chromium	Copper	Iron	Lead
Battle Creek	11S 1E 34	9-27-79	1200	58	7.7	*13.0	--	--	7	185	49.4	38	--	--	--	--	--	--	--	--	--	--	0.98	<.005
Battle Creek	13S 1E 6	9-27-79	1230	57	7.0	*14.0	--	--	9	205	41	29	--	--	--	--	--	--	--	--	--	--	*1.10	<.005
Battle Creek	14S 2W 1	9-27-79	1230	59	7.3	4.0	--	--	12	224	63	40	--	--	--	--	--	--	--	--	--	--	0.07	<.005
Battle Creek	14S 2W 1	7-31-80	1400	65	8.0	2.1	--	--	ND1	121	44	36	135	0.3	<.01	<.01	<.005	0.7	<.005	2.2	<.02	--	0.13	<.01
Battle Creek	14S 2W 1	8-16-76	0945	55.8	8.0	5.4	7.4	*83	14	60	44	--	--	--	--	--	--	--	--	--	--	--	0.09	<.01
Big Jacks Cr.	8S 4E 8	9-17-79	1445	*78	8.8	1.6	10.7	*127	<1	240	71	46	190	2.5	<.01	<.10	<.005	0.7	<.005	3.9	<.02	--	*1.5	.01
Big Jacks Cr.	8S 4E 8	7-31-80	1000	71	7.8	*12.1	--	--	<1	171	66	62	--	--	--	--	--	--	--	--	--	--	0.12	<.005
Big Jacks Cr.	10S 4E 8	9-17-79	1500	67	8.4	2.5	9.4	100	<2	254	69	42	--	--	--	--	--	--	--	--	--	--	*1.8	<.005
Big Jacks Cr.	10S 4E 8	7-31-80	1115	66	8.0	3.9	--	--	<1	103	52	48	140	--	--	--	--	--	--	1.5	--	--	--	--
Big Springs Cr.	11S 1E 34	9-27-80	1200	58	7.1	*26.0	--	--	18	198	30	20	--	--	--	--	--	--	--	--	--	--	*1.22	<.005
Blue Creek	12S 2E 27	9-17-80	1120	53	7.2	*22.0	--	--	34	220	43	29	--	--	--	--	--	--	--	--	--	--	*.99	<.005

Stream Name	Location T R Sec.	Magnesium	Manganese	Mercury	Molybdenum	Potassium	Selenium	Sodium	Chloride	Fluoride	Nitrogen Ammonia	Nitrogen Kjeldahl	Nitrogen Nitrate	Nitrogen Nitrite	Phosphate Total	Phosphate (Ortho)	Silica	Sulfate	Zinc	Fecal strept (#/100 ml)	Fecal Coliform (E.C.) (#/100ml)	Total Coliform (M.F.) (#/100ml)
Battle Creek	11S 1E 34	--	.075	--	--	--	--	--	37.5	--	*0.95	--	0.035	--	--	0.53	--	--	--	10	50	1035
Battle Creek	13S 1E 6	--	.032	--	--	--	--	--	40.0	--	*0.41	--	0.10	--	--	0.40	--	--	--	140	10	30
Battle Creek	14S 2W 1	--	.020	--	--	--	--	--	46.0	--	*0.26	--	0.092	--	--	0.27	--	--	.005	247	9	20
Battle Creek	14S 2W 1	7.2	<.01	<.005	<.10	4.4	<.002	13.0	3.8	0.9	0.05	0.40	<.10	<.01	<.01	<.01	36.0	9.0	--	--	--	--
Battle Creek	14S 2W 1	--	<.01	--	--	3.5	--	12.3	6.0	1.24	0.016	1.0	.003	.002	--	.06	33.8	<.001	2	11	15	
Big Jacks Cr.	8S 4E 8	--	.04	--	--	--	--	--	42.0	--	0.06	--	.018	--	--	.06	--	--	--	117	*620	87
Big Jacks Cr.	8S 4E 8	9.6	.04	--	<.10	7.2	<.002	12.0	4.1	0.4	*0.99	2.3	0.6	0.03	.38	0.34	40.0	18.0	.015	--	--	--
Big Jacks Cr.	10S 4E 8	--	<.01	--	--	--	--	--	40.0	--	<.05	--	.007	--	--	.08	--	--	--	349	<.10	11
Big Jacks Cr.	10S 4E 8	8.5	--	--	--	4.6	--	13.0	4.2	--	*0.61	<.10	--	--	.17	.04	--	11.0	--	--	--	--
Big Springs Cr.	11S 1E 34	--	.039	--	--	--	--	--	36.5	--	0.16	--	.028	--	--	.43	--	--	--	120	50	480
Blue Creek	12S 2E 27	--	.039	--	--	--	--	--	40.5	--	0.03	--	<.005	--	--	.15	--	--	--	207	379	400

Stream Name	Location T R Sec.	Date	Time	Temp °F	pH	Turb- idity	Dissolved Oxygen	% Saturation	Non-Filterable Residue	Filterable Residue	Alkalinity as CaCO ₃	Hardness	Specific Conductance	Aluminum	Arsenic	Barium	Beryllium	Boron	Cadmium	Calcium	Chromium	Copper	Iron	Lead
Bruneau River	10S 7E 9	9-17-80	0930	60	7.2	.95	8.9	*88	4	222	71	52	--	--	--	--	--	--	--	--	--	--	<.05	<.005
Bruneau River	10S 7E 9	7-30-80	1055	71	9.0	0.6	9.1	102	4	75	38	36	120	--	--	--	--	--	--	3.4	--	--	<.05	<.005
Bruneau River	11S 7E 2	9-17-79	1100	58	7.3	.97	9.0	*87	2	246	71	50	--	--	--	--	--	--	--	--	--	--	<.05	<.005
Bruneau River	11S 7E 2	7-30-80	1040		8.7	.60	--	--	92	37	40	110	<.10	<.01	<.10	<.005	0.9	<.005	2.4	<.02	--	0.10	<.01	
Bruneau River	13S 7E 5	9-17-79	1145	62	7.7	2.5	9.3	95	4	302	111	80	--	--	--	--	--	--	--	--	--	--	0.05	<.005
Bruneau River	13S 7E 5	7-30-80	1340	*74	*10	0.1	--	--	90	82	220	--	--	--	--	--	--	--	--	8.4	--	<.05	<.005	
Bruneau River	14S 6E 24	9-17-79	0930	55	7.8	2.4	--	--	292	113	80	--	--	--	--	--	--	--	--	--	--	<.05	<.005	
Bruneau River	16S 7E 5	9-17-79	0945	56	7.9	2.3	--	--	198	117	87	--	--	--	--	--	--	--	--	--	--	<.05	<.005	
Bruneau River	16S 7E 5	9-03-75	--	61	8.6	1.2	10.0	100	--	--	--	240	--	--	--	--	--	--	--	--	--	--	<.05	<.005
Duncan Creek	10S 4E 8	9-17-79	1500	67	8.0	2.3	8.9	95	218	56	38	--	--	--	--	--	--	--	--	--	--	--	.20	<.005
Duncan Creek	10S 4E 8	7-31-80	1115	69	9.0	1.9	--	--	42	130	--	--	--	--	--	--	--	--	--	1.6	--	--	--	<.05
Lt. Jacks Cr.	9S 2E 14	9-17-79	1545	64	7.4	6.5	8.0	94	28	234	34	24	--	--	--	--	--	--	--	1.4	--	--	.51	<.005
Lt. Jacks Cr.	9S 2E 14	7-31-80	1200	66	8.7	4.7	--	--	344	31	36	100	--	--	--	--	--	--	--	--	--	--	--	<.05

																					</	

Stream Name	Location T R Sec.	Date	Time	Temp °F	pH	Turb- idity	Dissolved Oxygen	% Saturation	Non-Filterable Residue	Filterable Residue	Alkalinity as CaCO ₃	Hardness	Specific Conductance	Aluminum	Arsenic	Barium	Beryllium	Boron	Cadmium	Calcium	Chromium	Copper	Iron	Lead	
Lt. Jacks Cr.	8S 3E 16	9-17-79	1530	64	7.3	2.3	--	--	3	197	51	44	--	--	--	--	--	--	--	--	--	--	.10	<.005	
Lt. Jacks Cr.	8S 3E 16	7-31-80	1030	68	8.5	1.4	--	--	<1	126	42	44	130	<.10	<.01	<.10	<.005	0.7	<.005	2.0	<.02	--	.09	<.01	
Mary's Creek	13S 5E 30	9-17-79	1015	53	7.2	3.6	--	--	2	222	71	59	--	--	--	--	--	--	--	--	--	--	.19	<.005	
Mary's Creek	13S 5E 30	8-12-80	1900	*74	*9.5	4.0	--	--	<1	106	54	50	130	--	--	--	--	--	--	5.8	--	--	--	<.01	
Mary's Creek	13S 5E 11	9-3-75	---	63.5	8.9	2.0	12.5	*130	15	---	96	---	175	---	---	---	---	---	---	---	---	---	---	---	
Owyhee River	14S 2W 1	9-27-79	1230	59	8.3	3.0	--	--	2	286	130	101	---	---	---	---	---	---	---	---	---	---	.18	<.005	
Owyhee River	14S 2W 1	7-31-80	1400	*72	8.5	1.4	--	--	<1	190	111	112	250	---	---	---	---	---	---	11	---	---	---	<.01	
Owyhee River	14S 1W 30	9-27-79	1300	62	8.6	3.6	--	--	4	304	137	102	---	---	---	---	---	---	---	---	---	---	.13	<.005	
Owyhee River	14S 1W 30	8-16-76	1910	55.4	8.8	3.0	8.6	--	96	9	178	120	112	62	---	---	---	---	<.005	27	---	---	.12	<.01	
Owyhee River	15S 1W 2	9-27-79	1330	57	8.4	4.3	--	--	7	295	134	100	---	---	---	---	---	---	---	---	---	---	.13	<.005	
Owyhee River	15S 1W 2	7-31-80	1415	71	*9.2	2.5	--	--	12	184	111	112	265	0.7	.01	<.10	<.005	1.0	<.005	10	<.02	---	.55	<.01	
Owyhee River	14S 2W 1	8-16-76	0943	55	8.5	4.5	7.0	*77	7	163	108	96	---	---	---	---	---	---	<.005	22	---	<.01	---	.12	<.01
Owyhee River	13S 3W 25	8-16-76	1015	55	8.4	3.5	8.1	90	9	---	100	84	50	---	---	---	---	<.005	21	---	<.01	---	.14	<.01	

Table 11 (cont.)

Stream Name	Location T R Sec.	Magnesium	Manganese	Mercury	Molybdenum	Potassium	Selenium	Sodium	Chloride	Fluoride	Nitrogen Ammonia	Nitrogen Kjeldahl	Nitrogen Nitrate	Nitrogen Nitrite	Phosphate Total	Phosphate (Ortho)	Silica	Sulfate	Zinc	Fecal Strept (#/100 ml)	Fecal Coliform (E.C.) (#/100ml)	Total Coliform (M.F.) (#/100ml)
Lt. Jacks Cr.	8S 3E 16	--	<.01	---	---	---	---	---	31.0	---	*.22	---	<.045	<.01	.12	.14	---	---	---	466	107	205
Lt. Jacks Cr.	8S 3E 16	8.1	.01	---	<.10	4.4	<.002	9.5	4.1	.01	<.05	0.3	<.10	<.099	---	.10	38.0	16	.009	116	46	40
Mary's Creek	13S 5E 30	---	.03	---	---	---	---	---	42.5	---	.15	---	---	---	---	.10	---	---	---	---	---	---
Mary's Creek	13S 5E 30	4.1	---	---	---	.40	---	11.0	3.4	---	*.80	---	---	---	.02	.02	---	3	---	---	---	---
Mary's Creek	13S 5E 11	---	<.01	---	---	3.1	---	8.8	<.02	<.05	*.22	---	<.01	.001	---	.04	---	<.10	---	2	50	---
Owyhee River	14S 2W 1	---	.029	---	---	---	---	---	38.5	---	.055	---	.016	---	---	.09	---	---	---	37	2	285
Owyhee River	14S 2W 1	21.0	---	---	---	4.5	---	9.6	5.0	---	*.89	---	<.10	---	.09	.04	---	16	---	---	---	---
Owyhee River	14S 1W 30	---	.025	---	---	---	---	---	45.5	---	.075	---	.038	---	---	.31	---	---	---	201	11	<.10
Owyhee River	14S 1W 30	---	<.005	---	---	3.6	---	15.6	10.0	.94	.016	.8	<.002	.002	---	.02	20.5	14	<.001	<.2	4	14
Owyhee River	15S 1W 2	---	---	---	---	---	<.002	15.0	4.3	0.7	.095	---	.145	---	.11	.11	---	---	.033	38	9	50
Owyhee River	15S 1W 2	20.0	.09	---	<.10	3.8	<.002	15.0	4.3	0.7	.18	1.3	<.10	<.01	.08	<.01	22.0	13	.033	---	---	---
Owyhee River	14S 2W 1	---	<.01	<.005	---	3.5	---	14.5	10.0	.89	.016	1.7	.011	.003	---	.03	22.3	13	<.001	<.2	3	15
Owyhee River	13S 3W 25	---	<.01	<.005	---	3.4	---	15.4	16.0	1.14	.115	.90	.013	.002	---	.06	20.5	12	<.001	6	1	3

Stream Name	Location T R Sec.	Date	Time	Temp °F	pH	Turb- idity	Dissolved Oxygen	% Saturation	Non-Filterable Residue	Filterable Residue	Alkalinity as CaO3	Hardness	Specific Conductance	Aluminum	Arsenic	Barium	Beryllium	Boron	Cadmium	Calcium	Chromium	Copper	Iron	Lead
Pole Creek	11S 2W 18	9-18-79	1230	70	8.0	3.4	10.2	*113	3	219	47	33	--	--	--	--	--	--	--	--	--	--	14	<.005
Pole Creek	11S 2W 18	8-13-80	1130	69	8.0	1.8	--	--	2	77	33	38	110	--	--	--	--	--	--	1.9	--	--	<.05	<.005
Sheep Creek	11S 7E 2	9-17-79	1100	54	7.7	0.38	10.5	97	2	204	89	71	--	--	--	--	--	--	--	--	--	--	<.05	<.005
Sheep Creek	11S 7E 2	7-30-80	1000	71	9.0	0.6	--	--	1	67	66	24	150	<.10	<.01	<.10	<.005	0.8	<.005	7.4	<.02	--	<.02	<.01
Sheep Creek	15S 5E 23	9-17-79	1000	52	7.1	4.3	--	--	5	241	91	72	--	--	--	--	--	--	--	--	--	--	.37	<.005
Sheep Creek	15S 5E 23	7-30-80	1400	70	8.0	1.7	--	--	10	121	60	64	150	--	--	--	--	--	--	8.6	--	--	--	<.005
Sheep Creek	14S 6E 15	9-3-75	--	63	8.1	2.5	8.9	92	5	--	82	--	150	--	--	--	--	--	--	--	--	--	.10	--
Shoofly Creek	7S 2E 23	9-27-79	1500	60	7.0	4.5	8.9	88	<.2	240	53	37	--	--	--	--	--	--	--	--	--	--	.28	<.005
Shoofly Creek	7S 2E 23	8-13-80	1400	--	7.7	3.8	--	--	4	123	45	42	140	--	--	--	--	--	--	5.0	--	--	--	--
Shoofly Creek	8S 2E 9	9-27-79	1615	64	7.5	4.2	--	--	2	224	42	28	--	--	--	--	--	--	--	--	--	--	.27	<.005
Shoofly Creek	8S 2E 9	7-31-80	1015	60	8.5	4.7	--	--	<.1	109	33	30	100	--	--	--	--	--	--	4.6	--	--	--	<.005
S.F. Castle Cr.	8S 1W 22	9-27-79	1645	63	7.8	*9.6	--	--	11	233	72	64	--	--	--	--	--	--	--	--	--	--	.44	<.005
S.F. Castle Cr.	8S 1W 22	8-13-80	1335	60	8.5	5.6	--	--	2	95	27	26	85	--	--	--	--	--	--	3.2	--	--	--	<.005

Stream Name	Location T R Sec.	Magnesium	Manganese	Mercury	Molybdenum	Potassium	Selenium	Sodium	Chloride	Fluoride	Nitrogen Ammonia	Nitrogen Kjeldahl	Nitrogen Nitrate	Nitrogen Nitrite	Phosphate Total	Phosphate (Ortho)	Silica	Sulfate	Zinc	Fecal Strept (#/100 ml)	Fecal Coliform (E.C.) (#/100ml)	Total Coliform (M.F.) (#/100ml)
Pole Creek	11S 2W 18	--	<.01	--	--	--	--	--	42.0	--	.06	--	<.05	--	--	.09	--	--	--	83	<10	10
Pole Creek	11S 2W 18	2.9	--	--	--	0.61	--	11.0	1.4	--	*.83	--	<.005	--	.02	.02	--	2	--	--	--	--
Sheep Creek	11S 7E 2	--	<.01	--	--	--	--	--	44.0	--	>.05	--	<.005	--	--	.04	--	--	--	38	*3,700	<1
Sheep Creek	11S 7E 2	4.3	.02	--	<.10	3.4	<.002	9.1	2.1	<.10	<.05	.30	<.10	--	.03	<.01	9.4	9	.008	--	--	--
Sheep Creek	15S 5E 23	--	.029	--	--	--	--	--	41.0	--	.06	--	.33	--	--	.18	--	--	--	841	20	10
Sheep Creek	15S 5E 23	7.1	--	--	--	3.6	--	8.5	2.5	--	.13	--	<.10	--	.09	<.01	--	8	--	--	--	--
Sheep Creek	14S 6E 15	--	.01	--	--	4.1	--	8.9	3.0	.12	.18	--	<.01	.002	--	.17	<.10	--	--	--	<2	8
Shoofly Creek	7S 2E 23	--	<.01	--	--	--	--	--	34.0	--	<.05	--	<.05	--	--	.19	--	--	--	2,214	*500	188
Shoofly Creek	7S 2E 23	2.9	--	--	--	0.69	--	12.0	3.0	--	.10	--	0.3	--	.06	.05	7	--	--	--	--	--
Shoofly Creek	8S 2E 9	--	<.01	--	--	--	--	--	48.0	--	.10	--	.024	--	--	.14	--	--	--	2,903	125	100
Shoofly Creek	8S 2E 9	5.1	--	--	--	3.8	--	8.3	2.8	--	.13	--	<.10	--	.10	.06	10	--	--	--	--	--
S.F. Castle Cr.	8S 1W 22	--	.021	--	--	--	--	--	27.0	--	*.23	--	.48	--	--	.19	--	--	--	589	312	415
S.F. Castle Cr.	8S 1W 22	1.6	--	--	--	0.57	--	7.5	0.5	--	.08	--	--	--	.09	.09	--	3	--	--	--	--

Stream Name	Location			Time	Temp °F	pH	Turbidity	Non-Filterable Residue	Filterable Residue	Alkalinity as Ca CO3	Hardness	Specific Conductance	Aluminum	Arsenic	Barium	Beryllium	Boron	Cadmium	Calcium	Chromium	Iron	Lead	
	T	R	Sec.																				
Canyon Creek	2S	7E	31	10-03-79	1230	54	7.1	*53	40	210	38	33	--	--	--	--	--	--	--	--	*3.16	<.005	
Canyon Creek	1S	6E	25	8-04-80	1330	70	8.5	*21	39	167	24	22	80	2.0	<.01	<.10	<.005	1.2	<.005	4	<.02	*1.8	<.01
Crown Creek	1S	6E	23	8-04-80	1310	64	7.0	0.6	12	164	23	24	--	--	--	--	--	--	2.3	--	--	--	
Long Tom Creek	1S	7E	31	10-03-79	1245	54	6.9	*57	52	202	38	29	--	--	--	--	--	--	--	--	*3.22	<.005	
Long Tom Creek	1S	8E	30	8-04-80	1145	64	8.0	*20	51	160	25	30	75	--	--	--	--	--	--	1.4	--	--	
Syrup Creek	1S	7E	31	10-03-79	1300	59	6.9	6.1	2	184	35	24	--	--	--	--	--	--	--	--	.69	<.005	
Syrup Creek	1S	6E	24	8-04-80	1310	62	8.5	4.1	8	139	20	18	60	--	--	--	--	--	--	2.6	--	--	
Bennett Creek	2S	8E	22	8-04-80	1035	53	8.0	*9.2	6	289	--	50	--	--	--	--	--	--	2.4	--	--	--	

Stream Name	Location T R Sec.	Magnesium	Manganese	Molybdenum	Potassium	Selenium	Sodium	Chloride	Fluoride	Nitrogen Ammonia	Nitrogen Kjeldahl	Nitrogen Nitrate	Nitrogen Nitrite	Phosphate Total	Phosphate (Ortho)	Silica	Sulfate	Zinc	Fecal Strept (#/100 ml)	Fecal Coliform (E.C.) (#/100ml)	Total Coliform (M.F.) (#/100ml)
Canyon Creek	2S 7E 31	---	.053	---	---	---	---	32.6	<.50	---	---	.092	---	---	.42	---	---	---	1240	50	30
Canyon Creek	1S 6E 25	2.3	.08	<.10	1.8	<.002	4.9	<.50	<.10	*.44	2.3	<.10	.02	.09	<.01	9	.022	---	---	---	---
Crown Creek	1S 6E 23	2.3	---	---	---	---	4.6	.90	---	*.43	---	<.10	.04	---	<.01	---	---	---	---	---	---
Long Tom Creek	1S 7E 31	---	.043	---	---	---	---	30.6	---	---	---	.64	---	---	.65	---	---	---	1384	47	400
Long Tom Creek	1S 8E 30	2.8	---	---	1.8	---	---	---	---	*.34	---	.90	---	.13	<.001	---	---	---	---	---	---
Syrup Creek	1S 7E 31	---	.013	---	---	---	---	31.1	---	---	---	.60	---	---	.50	---	---	---	1212	*1720	3400
Syrup Creek	1S 6E 24	2.2	---	---	---	---	4.5	<.50	---	*.34	---	<.01	<.01	---	<.01	---	---	---	---	---	---
Bennett Creek	2S 8E 22	1.8	---	---	1.1	---	3	<.5	---	---	---	1.0	<.01	.08	<.01	---	---	---	---	---	---

TEXT CHANGE SECTION

Page 1-1

Purpose and Need

Add the following 2 sentences after the first sentence of the paragraph beginning with "The purpose of ...":

The purpose of the proposal is to attain a portion of the applicable land use plan objectives developed for the area. These objectives are listed on Table 2-13 in the revised description of the proposed action.

Page 2-1 through Page 2-15

Description of the Proposed Action

Replace the description of the proposed action with the description included in this document.

Page 2-17

Project Development

Add the following section to number 1):

There would be 16 water troughs and 16 guzzlers installed on the additional lines. The storage reservoir capacity would be increased to one million gallons by enlarging the reservoirs to seven feet deep and 100 by 200 feet long. This would allow 4,000 cattle to use the vegetation available along the pipeline. Dates of livestock use would not change from the proposed action. Development cost for BLM would be approximately \$166,000 and rancher costs would be approximately \$83,000. Annual operating costs for the livestock operators would be approximately \$7,000.

Page 2-18

Table 2-8 (Implementation and Maintenance Cost)

Change the pipeline portion and the total cost column as follows:

From:

<u>Project</u>	<u>Units</u>	<u>BLM Cost</u>	<u>Rancher Cost</u>	<u>Annual Rancher Maintenance</u>
Pipeline	127 mi	<u>348,000</u>	<u>273,000</u>	<u>1,650</u>
Total Costs		2,988,000	1,360,000	32,790

To:

<u>Project</u>	<u>Units</u>	<u>BLM Cost</u>	<u>Rancher Cost</u>	<u>Annual Rancher Maintenance</u>
Jacks Creek	41 mi	166,000	83,000	410
Pipeline				
Other pipeline	<u>86 mi</u>	<u>172,000</u>	<u>215,000</u>	<u>1,240</u>
Total Cost		2,978,000	1,385,000	32,790

Page 3-1

Vegetation Types and Cover

Delete the acronym "(SVIM)" in the sixth paragraph on this page.

Page 3-2

Threatened and Endangered Plants

Replace the first paragraph of this section with the following paragraph:

An inventory in 1979 and 1980 was conducted for threatened or endangered plant species. Two endangered plants, Astragalus mulfordiae and Hackelia ophiobia were found. Four threatened plants were found, Astragalus camptopus, Astragalus yoder-williamsii, Erigeron latus and Lepidium davisii. These plants are maintaining themselves under present management.

Page 3-2, 3-3, and 3-4

Replace the phrase "SVIM inventory" with the phrase "soil vegetation inventory" in the following places:

Page 3-2 - 2nd full paragraph

Page 3-3 - 2nd and 4th full paragraphs

Page 3-4 - 1st full paragraph

Page 3-10

Sage Grouse

Delete the 3rd full paragraph in page 3-10.

Page 3-11

Valley Quail

Omit the word native from the first sentence.

Page 4-1

Assumption and Analysis Guidelines

Add the words "economic and vegetation" after the first word in number 4).

Page 4-5

Soil and Water Resources

Add the following paragraph to the end of this section:

As ground cover increases, especially herbaceous vegetation, infiltration would increase and increased ground water recharge would occur. A slight increase in spring flow may occur as a result of this increased groundwater recharge.

Page 4-7

Antelope

Replace the last sentence in the antelope section with the following:

Establishing crucial antelope winter/early spring ranges for priority management to improve habitat conditions (i.e., changing turnout dates and/or grazing systems) would provide for population increases.

Page 4-7

Bighorn Sheep

Replace the entire section with the following:

The proposed Jacks Creek pipeline would adversely impact bighorn sheep. Although the pipeline is outside the bighorn habitat boundary, it would provide water for livestock and thus allow them to forage at least a mile into bighorn habitat. Approximately two to three square miles of bighorn habitat east of Rattlesnake Creek would be available for livestock use. Five to 10 bighorn sheep may be displaced by this use.

A key management area for bighorn sheep habitat would be established on Battle Creek to improve bighorn habitat. This would include changes in turnout dates and/or grazing systems. Resulting range improvement would allow bighorn sheep habitat conditions to improve and population levels would be maintained. Consequently, bighorn sheep objectives would be met.

Page 4-8

Sage Grouse

Replace the last sentence of the seventh paragraph with the following:

Establishment of rest or deferred grazing systems on critical

brood rearing areas and providing for large meadow areas to be fenced, if necessary, would allow sage grouse populations to increase.

Page 4-9

Meadow/Riparian Associated Wildlife

Add the following two paragraphs after the fifth paragraph in this section:

Nonfenced riparian zones not protected by rugged canyons are often heavily utilized by livestock. Such use results in reduced cover for wildlife (reduced nesting and hiding cover for birds and small mammals), and a decline in forage quality as annuals and non-riparian species invade and become more dominant in the community. The degradation in habitat quality in turn results in the decline in population and species diversity of small mammals and birds.

The implementation of grazing systems will provide some rest for riparian areas. Depending upon the system implemented 1/2 to 2/3 of an allotment could be rested during the period most important to wildlife (spring through mid-summer). Once cattle are introduced into the pasture, the meadow cover will be reduced rapidly due to livestock concentration on the succulent vegetation.

Page 4-20

Economics

Add the following section prior to the secondary impact section on page 4-20:

Recreation Benefits

The economic value of increased recreation use (10,100 hunter days) would be \$286,840 by year 20. This was calculated as follows:

20-Year Hunter Day Increase Calculation:

Base Hunter Days (Chap. 3-Recreation)	123,007
Proposed Action Hunter Days (Chap. 4-Recreation)	194,600
Continue Present Mgmt. Hunter Days (Chap. 4-Recreation)	184,500
Hunter Day Increase Due to Proposal	10,100

Recreation Visitor Day Value Calculation:

<u>Hunter Type</u>	<u>USFS RVD Value</u>	<u>Percent of Total</u>	<u>Composite Value</u>
Big Game	\$23.10	9.5	\$ 2.19
Upland Game	27.20	57.3	15.59
Waterfowl	<u>32.00</u>	<u>33.2</u>	<u>10.62</u>
TOTAL	----	100.0	\$28.40

Value of Recreation Visitor Use Day Increases at end of 20 Years:

10,100 Hunter Days x \$28.40 per day
\$286,840 total value of increased Recreation Visitor Days

Page 4-36

Add the following section prior to the secondary impact section:

Recreation Benefits

The economic value of increased recreation use (25,500 hunter days) would be \$724,200 by year 20.

Page 4-54

Add the following section prior to the secondary impact section:

Recreation Benefits

The economic value of increased recreation use (20,500 hunter days) would be \$582,200.

Page 4-56

Irreversible and Irretrievable Commitments of Resources

Replace number 5) with the following statement and add Number 6):

- 5) livestock production and income losses,
- 6) wildlife population losses.

Page B-1 - Appendix

Forage Allocation Methodology

Delete the 7th paragraph on this page.

Page B-2 and B-3

Available Forage Production Determination

Replace the last paragraph on page B-2 through the second full paragraph on page B-3 with the following:

To determine the amount of forage available for allocation, range sites were first stratified by condition class. Then production statistics were run on representative samples of each stratum (range site by condition class) to determine the mean herbage production and the range in production to be expected with an 80% confidence interval. A climatic adjustment factor was then applied to the resulting per acre production values for each stratum to account for yearly variation in plant growth (Sneva and Hyder, 1962).

Total forage production was calculated for each soil mapping unit, by multiplying the pound per acre forage production of each stratum by the percentage each stratum makes up in the mapping unit and summing the result. The percent composition of each soil mapping unit was determined from a correlated third order soil survey.

Total forage production on an allotment basis was calculated by multiplying the pounds per acre forage production of each soil mapping unit by the associated number of acres contained in each allotment and then summing the result.

Page B-4 - Appendix

Range Suitability Methodology

Replace the second paragraph with the following paragraph and table:

Those portions of the rock outcrop site shown on Table B-2a were considered non-suitable and forage produced on this range site was not allocated to livestock. Forage was not allocated on approximately 65% of the McConnell Allotment (823) because slopes in this area exceeded 50%.

Table B-2a
Unsuitable Range

Allot. No.	Name	Acreage
0801	Castle Creek	436.2
0802	Battle Creek	8,505.5
0803	Big Springs	3,665.8
0805	Riddle	4,337.4
0808	Northwest	12,144.2
0809	Center	1,083.3
0810	Scotts Table	1,594.2
0811	Canyon View Seeding	340.0
0812	Miller Table Seeding	252.8
0840	Strickland-Hall-Yates	5,050.6
0842	M & L	211.6
0843	Simplot	3,741.3
0844	Tindall & Sons	897.6
0846	Alzola	809.7
	TOTAL	43,067.2

The acreage figures are represented by the soil mapping unit number 7, rock outcrops, which are in good to excellent range condition, 50% or greater slopes and contain 70% or more rock.

Glossary

Replace the definition of range site with the following:

A distinctive kind of rangeland, which in the absence of abnormal disturbance and physical site deterioration, has the potential to support a native plant community typified by an association of species different from that of other sites. This differentiation is based upon significant differences in kind or proportion of species, or total productivity.

Page R-1

References

Add the following to the References section:

Dean, H. C. and J.J. Spillett. 1976. Bighorns in Canyonland National Park. Desert Bighorn Council Trans 20:15-17.

Irvine, C.A. 1969. The desert bighorn sheep of southeastern Utah. Utah Fish and Game Publ. 69-12. 99 pp.

Russ, J.P. 1956. The desert bighorn sheep in Arizona. Arizona Game and Fish Dept. Wildl. Bull. No. 1. 153 pp.

Sheva, Forest A., and Hyder, Donald N. 1962. "Forecasting Range Herbage Production in Eastern Oregon." Ag. Experiment Station Bulletin No. 588, Oregon State University, Corvallis, Oregon.

Wilson, L.O. 1968. Distribution and Ecology of desert bighorn sheep in southeastern Utah. Utah Fish and Game Publ. 68-5. 220 pp.

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